

Sinco Technologies Pte Ltd. v. Sinco Electronics (Dongguan) Co. Ltd., *et al*

# APPENDIX C

## TRIAL EXHIBITS & OBJECTIONS

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>1</b>	7/5/2005	SinCo Registered U.S. TM Reg. No. 3,188,537 with Combined Declaration of Use and Incontestability Under Section 8 and 15 for 3188537	SINCO000469	Valid Trademark	Chee	Hearsay. No objections to fact of filing; but contents are hearsay.	FRE 803 (6) & (8)	
<b>2</b>	8/6/2012	SinCo Registered U.S. TM Reg. No. 4,524,165 with Combined Declaration of Use and Incontestability Under Section 8 and 15 for 4524165	SINCO000470	Valid Trademark	Chee	Hearsay. No objections to fact of filing; but contents are hearsay.	FRE 803 (6) & (8)	
<b>3</b>	8/16/2012	SinCo Registered U.S. TM Reg. No. 4,524,172 with Combined Declaration of Use and Incontestability Under Section 8 and 15 for 4524172	SINCO000473	Valid Trademark	Chee	Hearsay. No objections to fact of filing; but contents are hearsay.	FRE 803 (6) & (8)	
<b>4</b>	8/16/2012	SinCo Registered U.S. TM Reg. No. 4,524,173 with Combined Declaration of Use and Incontestability Under Section 8 and 15 for 4524173	SINCO000475	Valid Trademark	Chee	Hearsay. No objections to fact of filing; but contents are hearsay.	FRE 803 (6) & (8)	
<b>5</b>	1/2/2012	SinCo Supply Agreement with Sinco Electronics (Dongguan) Co Ltd.	SINCO038233 - 239	Contract Manufacturer	Chee			
<b>6</b>	1/2/2012	SinCo Supply Agreement with Sinco Group Holdings Pte Ltd.	SINCO038240-246	Contract Manufacturer	Chee			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
7	2012-2016	SinCo's Sales By Customer	SINCO038443	Sales	Chee	FRE401/403/Hearsay/Foundation/Authenticity	FRE 803 (6)	
8	Year 2013	Sales and Purchase Report Humen 2013	SINCO2196557.000001	Sales	Chee/ Cox Report	FRE401/403/Hearsay/Foundation/Authenticity	FRE 803 (6)	
9	Year 2014	Sales and Purchase Report Humen 2014	SINCO2196558.000001	Sales	Chee/ Cox Report	FRE 401/403/Hearsay/Foundation/Authenticity	FRE 803 (6)	
10	Year 2015	Sales and Purchase Report Humen 2015	SINCO2196559.000001	Sales	Chee/ Cox Report	FRE401/403/Hearsay/Foundation/Authenticity	FRE 803 (6)	
11	Year 2016	Sales and Purchase Report Humen 2016	SINCO2196560.000001	Sales	Chee/ Cox Report	FRE401/403/Hearsay/Foundation/Authenticity	FRE 803 (6)	
12	Year 2017	Sales and Purchase Report Humen 2017	SINCO2196561.000001	Sales	Chee/ Cox Report	FRE401/403/Hearsay/Foundation/Authenticity	FRE 803 (6)	
13	Year 2018	2018 Sales Projection SINCO	SINCO910694 (2pgs)	Sales	Chee	FRE 401/403/Hearsay/Foundation/Authenticity	FRE 803 (6)	
14	3/21/2014	SinCo TERMS & CONDITIONS to P.O.	SINCO000109-110	Contract Manufacturer	Chee	JM - Defs' Obj. (a)	inapplicable as separate	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
15	Year 2012	2012 Purchase Order Agreement	SINCO031492; SINCO031502; SINCO031507; SINCO031508; SINCO031515; SINCO031542; SINCO031593; SINCO031633; SINCO031637; SINCO031664	Contract Manufacturer	Chee			
16	Year 2013	2013 Purchase Order Agreement	SINCO031889; SINCO031930; SINCO031967; SINCO031969; SINCO031997; SINCO032007; SINCO032023; SINCO032025; SINCO032084; SINCO032102	Contract Manufacturer	Chee			
17	Year 2014	2014 Purchase Order Agreements	SINCO032222; SINCO032221; SINCO024731; SINCO025552; SINCO032223; SINCO032225; SINCO032224; SINCO032229; SINCO032230 and and SINCO000109-110	Contract Manufacturer	Chee	Joint Memo (JM) - Defs' Obj. (a)	P.O.s refer to Terms & Conditions attached	



## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
18	Year 2015	2015 Purchase Order Agreements	SINCO032408; SINCO026065; SINCO032402; SINCO032403; SINCO032404; SINCO032429; SINCO032447; SINCO032482 and SINCO000109-110	Contract Manufacturer	Chee	Joint Memo (JM) - Def's Obj. (a)	P.O.s refer to Terms & Conditions attached	
19	Year 2016	2016 Purchase Order Agreements	SINCO032580; SINCO028759; SINCO029484; SINCO029742; SINCO029750; SINCO032619; SINCO032622 and SINCO000109- 110	Contract Manufacturer	Chee	Joint Memo (JM) - Def's Obj. (a)	P.O.s refer to Terms & Conditions attached	
20	Year 2017	2017 Purchase Order Agreements SINCO and DG and SINCO and Xingke	SINCO01821243; SINCO001821248- 53; SINCO030013 SINCO032777 and SINCO000109- 110	Contract Manufacturer	Chee	Joint Memo (JM) - Def's Obj. (a)	P.O.s refer to Terms & Conditions attached	
21	3/6/2015	P.O. from SINCO to XK	SINCO000111-130	Contract Manufacturer	Chee			
22	2/11/2014	P.O. from SINCO to XK RE:	SINCO023882	Contract Manufacturer	Chee			
23	8/16/2016	Notification Regarding board meeting of SinCo Electronics (DG) Pte Ltd Held on 16 August 2016	SINCO791222-232	Police Mark	Chee	JM - Defs' Obj. (d)	FRE 803 (5)(6)(15)	
24	6/24/2016	U.S. Visa Application	MARKLiew000197- 203	Lack of confusion/ Willfulness	Liew			
25	6/26/2016	Mr. Liew's Email to SINCO Requesting Approval for Personal Travel	SINCO001883212- 213	Lack of Confusion/ Willfulness	Liew			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
26	6/1/2017	Order Granting Preliminary Injunction		Notice	Judicial Notice	Defs' MIL 4	Notice and Willful	
27	7/24/2018	Order Granting Preliminary Injunction		Notice	Judicial Notice	Defs' MIL 4	Notice and Willful	
28		Reserved						
29	10/30/2018	ORDER Granting Plaintiff's Motion for Preliminary Injunction		Disclaimer	Judicial Notice	Defs' MIL 4	Notice and Willful	
30	1/2/2019	ORDER on Stipulation RE CONTEMPT of DEFENDANT MARK LIEW		Google Willfulness	Liew	Defs' MIL 4	Notice and Willful	
31	7/31/2020	Court Order Denying Mr. Liew's motion to vacate and set aside injunction and adjudication of contempt		Knowledge of Litigation	Liew	Defendants' MIL 4. Limited purpose of "knowledge" fails FRE 403 balancing.	Notice and Willful, Admission FRE 803 (8), 804 (1)(a),(3)	
32	12/21/2011	Liew Passport	Depo Ex. 40	U.S. Conduct	Liew			
33	11/18/2016	Liew Passport	Depo Ex. 144	U.S. Conduct	Liew			
34	2/1/2012	Cy Ng Passport 07Sep2017	Depo Ex. 82	U.S. Conduct	Cy Ng			
35	2/8/2017	Cy Ng Passport 07Sep2022	Depo Ex. 81	U.S. Conduct	Cy Ng			
36	4/29/2016	Tjoa Passport	Depo Ex. 130	U.S. Conduct	Tjoa			
37	2/15/2015	Passport of Seow Eng Quek	XKW0000001-020	U.S. Conduct	Seow Eng Quek			
38	8/2/2012	Passport Of Gao Huiyun	XKW37-49	U.S. Conduct	Gouki Gao			
39	3/6/2018	Passport of Eric Pang	XKW0050-55	U.S. Conduct	Eric Pang			
40		I94- Liew		U.S. Conduct	Judicial Notice			
41		I 94 Cy NG		U.S. Conduct	Judicial Notice			

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Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>42</b>		I 94 Tjoa		U.S. Conduct	Judicial Notice			
<b>43</b>		I 94 Eng		U.S. Conduct	Judicial Notice			
<b>44</b>	5/21/2016	Email from Andy Lim (Google) to Minh and Jon at SINCO	SINCO001878847	Sinco Customer	Minh			
<b>45</b>	6/24/2016	Minh Chi Nguyen's July 24, 2016 email communication with Google team regarding the tooling kick off	SINCO945758	Sinco Customer	Minh			
<b>46</b>	7/9/2016	Ming's Email re to Liew CSR	SINCO002194538 - 4540	Sinco Customer	Minh			
<b>47</b>	7/14/2016	Factory Development through Liew	DEFS_0182603-605	Sinco Customer	Liew			
<b>48</b>	7/28/2016	Email from A.Lim to SINCO RE:Forecast Plan schedule	SINCO000233-236	Google as Sinco Customer	Andy Lim			
<b>49</b>	8/20/2016	Email Tjoa and Google- Showing Confusion	ML00000455-456	Trademark Infringment	Tjoa			
<b>50</b>	9/17/2016	Email from Andy Lim to Mark Liew	NG00109-111	Sinco Customer	Liew			
<b>51</b>	9/23/2016	Email Google to Defendant	ML00000459-462	Sinco Customer	Liew			
<b>52</b>	11/15/2016	Email MSA with Google	SINCO000243 - 290	Sinco Customer				
<b>53</b>	3/16/2018	Email Tjoa to Google	ML00000472-474	Trademark Infringment	Tjoa	JM - Defs' Obj. (b)	FRE 804 (3) 803 (6)	
<b>54</b>	10/18/2013	Email from Bryan Lim to Xu Shugong re China vs. Singapore Sinco Companies	SINCO00972000-2002	No Knowledge Factory Selling To U.S.	Chee / Lim	JM - Defs Obj. (k)	FRE 803 (6), scope of use, knowledge of sales by DG in U.S.	

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Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>55</b>	2/12/2018	Email from Intel to Xingke	NG102055-2071	Confusion	Cy Ng	FRE 106. DEFS_0144179-DEFS_0115569 contains higher-resolution copy.	Attachemnts referenced do not change meaning	
<b>56</b>	7/2/2015	Email BOSE factory visit on August 2, 2015	SINCO326303-326305	Sinco Customer	Chee	FRE 106. No objections so long as this also includes SINCO326305	Already provided on 9/13 by email	
<b>57</b>	7/31/2015	Email BOSE factory visiton August 2 and 3rd	SINCO791986-89	Sinco Customer	Chee			
<b>58</b>	8/3/2015	Slide presentation at Factory	Depo Ex. NG 52	Sinco Customer	Chee			
<b>59</b>	9/22/2015	Email RE:Bose visit Factory - Oct 12th	SINCO745573-74	Sinco Customer	Chee			
<b>60</b>	10/12/2015	Slide presentation at Factory	SINCO745573-75	Sinco Customer	Chee			
<b>61</b>	10/22/2015	Email RE:BOSE visit Factory - Oct 22nd	SINCO537120-121	Sinco Customer	Chee			
<b>62</b>	10/22/2015	SINCO email RE: Factory Visit	SINCO1886607-608	Sinco Customer	Chee			
<b>63</b>	11/17/2015	Email from Liew to Ng RE:Bose Project Projects	SINCO00406-449	Sinco Customer	Chee			
<b>64</b>	7/24/2015	Bose - Customer Visits SinCo Factory Email Comms.	SINCO326176-178	Sinco Customer	Chee			
<b>65</b>	1/8/2016	SINCO email to XK as to project	SINCO001173855-67	Sinco Customer	Chee			
<b>66</b>	12/10/2016	Email correspondence between ML KOTL and Cy Ng re Bose Customer and follow up actions	ML17340-ML17303		Cy Ng and Tjoa			
<b>67</b>	12/10/2016	Email from ML KOTL to CY Ng re Bose Misrepresentation Slide	DEFS_0010583-84	Bose as SINCO customer	Tjoa and Cy Ng			

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Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
68	10/12/2016	Bose Visit Slide presentation at factory	SINCO575083	Bose as Sinco Customer	Chee			
69	12/10/2016	Audio recording of Mui Liang Tjoa's Bose presentation on December 10, 2016	SINCO575082	Trademark Infringement	Tjoa			
70	12/10/2016	Transcript of audio recording of Mui Liang Tjoa's presentation	SINCO575082	Trademark Infringement	Tjoa			
71	12/10/2016	Ltr to Bose Management	SINCO000972478	Sinco Customer	Chee	JM - Defs' Obj. (d)	Def.'s put at issue	
72	12/20/2016	Email from Bose to ML Tjoa re KOTL visit to Bose	ML20387-390		Tjoa			
73	12/15/2016	Tjoa email to Bose	ML00000426-427		Tjoa			
74	12/20/2016	Tjoa email to Bose	ML00000428-431		Tjoa			
75	1/19/2017	Email from SINCO to Bose	SINCO000970630 - 032	Sinco Customer	Chee	JM - Defs' Obj. (d)	Def.'s put at issue	
76	1/20/2017	Tjoa Handwritten notes	ML00000444		Tjoa			
77	1/20/2017	Tjoa email to Bose	ML00000435-437		Tjoa			
78	3/15/2017	XINGKE name change	SINCO576259 - 260	Trademark Infringement	Deqiang Liu/ Tjoa			
79	8/22/2016	Email to Google from Minh	SINCO926221-228	Sinco Customer	Minh			
80	9/9/2016	Board Meeting of XingKe August 16, 2016	SINCO001831742-763	Acquisition	Chee			

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Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
81	4/26/2018	Ruling on request for Nullification of Trademark SinCo of No. 8607396		Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
82	5/4/2018	Ruling on request for Nullification of Trademark SinCo of No. 8607476		Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
83	7/5/2018	Miriam's Letter to OED File number G3352		Willful	Judicial Notice	JM - Defs' Obj. (c)	FRE 803 (6) & (8)	
84	10/20/2018	Declaration of Miriam Paton Re Improper Use of Identity By Xingke Electronics DG		Willful/Identity Theft	Miriam Paton/ Judicial Notice	JM - Defs' Obj. ©	FRE 803 (6) & (8)	
85	9/26/2018	ANSWER filed in USPTO Xu Shugopng		Willful/Fraud	Judicial Notice	FRE 403; Defs' MIL 2	Availability of witness FRE 803 (6) & (8)	
86	11/20/2018	XINGKE'S Motion to Suspend for Civil Action and supporting declarations		Willful	Judicial Notice/ Tjoa's Declaration	Defs' MIL 2	Availability of witness FRE 803 (6) & (8)	
87		Declaration of Chen Yueliang ISO Opposition 91243086		Intent	Judicial Notice	Defs' MIL 2	Availability of witness FRE 803 (6) & (8)	
88	11/20/2018	Tjoa DEclaration before the USPTO		Willful/Perjury	Judicial Notice/ Tjoa's Declaration	FRE 403; Defs' MIL 2	Availability of witness FRE 803 (6) & (8) 804 (b)(3)	
89	3/27/2018	AFFIDAVIT OF GUANGLEI ZHANG AS TO RELATED PRC PROCEEDINGS ON THE SINCO MARKS		Willful	Guanglei	JM - Defs' Obj (c)	FRE 803 (6) & (8)	
90	12/22/2019	Declaration of Guanglei ISO Plaintiff's Opposition to Defendant's Motion For Partial Summary Judgment		Dissolution of Sinco Silicone Rubber	Guanglei	JM - Defs' Obj (c)	FRE 803 (6) & (8)	

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Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
91	9/6/2016	FILE WRAPPER: TM Application SN 87161260 for "SINCO" by Wenzhou Mingde Int. Co., Ltd. (Abandoned on May 9, 2017)	First Use: April 1, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
92	11/7/2016	OFFICE ACTION S/N 87161260	SINCO000508	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
93	1/13/2017	File Wrapper: DG TM App. SN 87300153 for "SinCo" logo (Abandoned on May 1, 2018)	First Use: May 1, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
94	1/13/2017	FILE WRAPPER: DG TM App. SN 87300194 for "SinCo" (Abandoned on Dec 16, 2019)	First Use: March 2, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
95	1/13/2017	FILE WRAPPER: DG TM App. SN 87300246 for "SinCo" logo (ABANDONED on Sept. 28, 2017)	First Use: Sept. 16, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
96	1/13/2017	FILE PROCEEDINGS WRAPPER: DG TM App. SN 87300246 for "SinCo" logo (ABANDONED on Sept. 28, 2017)	First Use: Sept. 16, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
97	1/13/2017	FILE WRAPPER: DG TM App. SN 87300275 for "SinCo" logo (ABANDONED on July 23, 2018)*	First Use: January 12, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>98</b>	1/13/2017	FILE PROCEEDINGS WRAPPER: DG TM App. SN 87300275 for “SinCo” logo (ABANDONED on July 23, 2018)*	First Use: January 12, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
<b>99</b>	1/13/2017	FILE WRAPPER: DG TM App. SN 87300299 for “SinCo” logo (Abandoned on Dec 16, 2019)	First Use: Sept. 12, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
<b>100</b>	1/20/2017	FILE WRAPPER: DG TM App. SN 87307903 for “SinCo” logo (ABANDONED on Oct. 13, 2017)	Intent to Use	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>101</b>	1/20/2017	FILE PROCEEDINGS WRAPPER: DG TM App. SN 87307903 for “SinCo” logo (ABANDONED on Oct. 13, 2017)	Intent to Use	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>102</b>	1/20/2017	FILE WRAPPER: DG Trademark Application SN 87307929 for “SinCo” (ABANDONED on Jan. 17, 2018)	Intent to Use	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>103</b>	1/20/2017	FILE PROCEEDINGS WRAPPER: DG Trademark Application SN 87307929 for “SinCo” (ABANDONED on Jan. 17, 2018)	Intent to Use	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>104</b>	1/20/2017	FILE WRAPPER: DG Trademark Application SN 87307939 for “SinCo” (ABANDONED on Jan. 17, 2018)	Intent to Use	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	



## CONSOLIDATE TRIAL EXHIBITS

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<b>105</b>	1/20/2017	FILE PROCEEDINGS WRAPPER: DG Trademark Application SN 87307939 for "SinCo" (ABANDONED on Jan. 17, 2018)		Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>106</b>	1/20/2017	FILE WRAPPER: DG Trademark Application SN 87307950 for "SinCo" (ABANDONED on Feb. 9, 2018)	First Use: Apr. 01, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
<b>107</b>	1/20/2017	FILE WRAPPER: DG Trademark Application SN 87307959 for "SinCo" (ABANDONED on Oct. 13, 2017)	First Use: Aug. 5, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
<b>108</b>	1/20/2017	FILE PROCEEDINGS WRAPPER: DG Trademark Application SN 87307959 for "SinCo" (ABANDONED on Oct. 13, 2017)	First Use: Aug. 5, 2016	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8), 804 (b)(3)	
<b>109</b>	2/23/2017	FILE WRAPPER: DG Trademark Application SN 87347832 for "SinCo" (ABANDONED on Oct. 13, 2017)	Intent to Use	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>110</b>	2/23/2017	FILE PROCEEDINGS WRAPPER: DG Trademark Application SN 87347832 for "SinCo" (ABANDONED on Oct. 13, 2017)	Intent to Use	Willful	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>111</b>	4/26/2017	DG Trademark Application SN 87425484 for "XINGKE" (ABANDONED on Dec 19, 2017)		Trademark Infringement	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	

**CONSOLIDATE TRIAL EXHIBITS**

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<b>112</b>	3/20/2017	DG Trademark Application SN 87377118 for “XINGKE” (ABANDONED on Dec 19, 2017)		Trademark Infringement	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>113</b>	10/24/2017	DG Trademark Application SN 87658544 for “XINGKE” - Pending		Trademark Infringement	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>114</b>	10/24/2017	DG Trademark Application SN 87658552 for “XINGKE” - Pending		Trademark Infringement	Judicial Notice	Defs' MIL 2	FRE 803 (6) & (8)	
<b>115</b>	8/16/2018	SinCo's August 16, 2018, Opposition No. 91243086 filed with the USPTO Trademark Trial and Appeal Board opposing Trademark Applications 87658544 and 87658552		Notice	Judicial Notice	Hearsay / Defs' MIL 2	FRE 803 (6) & (8)	
<b>116</b>	10/23/2018	United States Patent and Trademark Office October 23, 2018 order suspending proceedings for Opposition No. 91243086		Safe Distance Rule	Judicial Notice	FRE 401/403/Defs' MIL 2	FRE 803 (6) & (8)	
<b>117</b>	11/21/2018	XingKe's November 21, 2018 motion to suspend the opposition proceedings based in part on a fraudulent declaration signed by Defendant Mui Liang Tjoea		Safe Distance Rule	Judicial Notice/ Tjoea	Defs' MIL 2	FRE 803 (6) & (8)	
<b>118</b>	11/20/2018	Declaration of Chen Yueliang ISO Opposition 91243086		Intent	Judicial Notice	Def's MIL 2	FRE 803 (6) & (8)	

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<b>119</b>	12/3/2019	Congressional testimony re Fraudulent Trademarks		Intent	Judicial Notice	JM - Defs' Obj. (f)	FRE 803 (8)	
<b>120</b>	7/18/2019	Article on Statement of Mary Baney Denison re Counterfeits and Cluttering		Intent	Judicial Notice	JM - Defs' Obj. (f)	FRE 803 (8)	
<b>121</b>	7/18/2019	Written Testimony of Robert C. Barchiesi on Counterfeits and Cluttering		Intent	Judicial Notice	JM - Defs' Obj. (f)	FRE 803 (8)	
<b>122</b>		Trademark Report of SinCo Technologies PTE Report	SINCO30b6DEPO001	Trademarks	30(b)(6)	Hearsay/Foundation	FRE 803 (8) Def's doc.	
<b>123</b>	1/25/2017	SinCo's trademark registrations - Hong Kong, USA, and Virgin Islands	SINCO30b6DEPO036-044	Trademarks	30(b)(6)	FRE 401/403; Defs' MIL 2	FRE 803 (8) Def's doc.	
<b>124</b>		Reserved						
<b>125</b>		Reserved						
<b>126</b>		Deqiang Liu Business Card KOTL	Depo Ex. 281	Trademark	Deqiang Liu			
<b>127</b>		SINCO Business Card	SINCO575086	Trademark	Chee			
<b>128</b>		SINCOO Business cards	Depo Ex.141	Trademark	Chee	Defs' MIL No. 3	See. Opp to Mil. D.No. 3	
<b>129</b>		SINCOO Business cards- Tom Chen	Depo Ex. 94	Trademark	Chee	Defs' MIL No. 3	See. Opp to Mil. D.No. 3	
<b>130</b>		SINCO Business Card - EC HU	Depo Ex. 95	Trademark	Chee	Defs' MIL No. 3	See. Opp to Mil. D.No. 3	
<b>131</b>		Reserved						
<b>132</b>		Reserved						
<b>133</b>	1/7/2019	XINGKE website www.xingkecn.com	SINCO962243	Trademark	Judicial Notice	JM - Defs' Obj. (e)	FRE 803 (6)	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>134</b>	1/17/2018	SINCOO Website www.sincoo.cn	SINCO575129-139	Trademark	Judicial Notice	Def Mil 3	Plaint. Opp to Mil 3	
<b>135</b>	1/7/2019	SINCOO Website www.sincoo.cn	SINCO962164-203	Trademark	Judicial Notice	Def Mil 3	Plaint. Opp to Mil 3	
<b>136</b>	9/9/2021	XINGKE website www.xingkecn.com		Trademark	Judicial Notice	JM- Def's obj (e)	FRE 803(1) (6),(8)	
<b>137</b>		Reserved						
<b>138</b>	8/22/2012	Motorola Supply Agreement	SINCO608031-058	Sinco Customer	Chee			
<b>139</b>	1/8/2014	Purchase Order- Motorola Solutions	SINCO681222-225	Sinco Customer	Chee			
<b>140</b>	4/2/2015	Purchase Order - Motorola Mobility to SinCo on Kinzie	SINCO026270-	Sinco Customer	Chee			
<b>141</b>	4/28/2015	Purchase order with Motorola directly to SINCO	SINCO026399-400	Sinco Customer	Chee			
<b>142</b>	12/22/2015	Motorola Purchahse Order (Kinzie) with Terms and conditions	SINCO677916-927	Sinco Customer	Chee			
<b>143</b>	1/19/2016	Purchase Order- Motorola Mobility LLC	SINCO573204-205	Sinco Customer	Chee			
<b>144</b>	7/3/2002	Motorola and SINCO Agreement	SINCO575810-811	Sinco Customer	Chee			
<b>145</b>	6/20/2014	Bose Corporation Purchase Agreement	SINCO575756-781	Sinco Customer	Chee			
<b>146</b>	7/29/2014	Purchase Order- Bose	SINCO577238	Sinco Customer	Chee			
<b>147</b>	7/13/2015	Purchase Order- Bose	SINCO026905	Sinco Customer	Chee			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>148</b>	12/17/2015	Bose Purchase Order to SCM	SINCO2194914	Sinco Customer	Chee			
<b>149</b>	5/16/2016	Purchase Order - Bose to SinCo on	SINCO675938-40	Sinco Customer	Chee			
<b>150</b>	5/25/2016	SINCO Purchase Order re: Project	SINCO032687	Sinco Customer	Chee			
<b>151</b>	6/3/2016	SINCO and BOSE Purchase Order	SINCO675944	Sinco Customer	Chee			
<b>152</b>	2/10/2014	Purchase Order- Amazon to SinCo	SINCO673243-246	Sinco Customer	Chee			
<b>153</b>	3/10/2015	Purchase Order- Amazon to SinCo	SINCO673247-2251	Sinco Customer	Chee			
<b>154</b>	3/3/2016	Purchase Order- Amazon to SinCo	SINCO673270-275	Sinco Customer	Chee			
<b>155</b>	4/1/2014	SINCO's NDA with Google	SINCO038256-57	Sinco Customer	Chee			
<b>156</b>	11/9/2016	FULLY EXECUTED Master Purchase Agreement with Google (Asia)	SINCO743413-456	Sinco Customer	Chee			
<b>157</b>	2/3/2017	Purchase Order- Google (Asia) to SinCO	SINCO675996	Sinco Customer	Chee			
<b>158</b>	6/1/2018	Purchase Order- Google (US) to SinCo	SINCO913523	Sinco Customer	Chee			
<b>159</b>	3/19/2015	Purchase Order- Apple	SINCO030397	Sinco Customer	Chee			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>160</b>	1/4/2016	Purchase order with Intel directly to SinCo	SINCO1490928	Sinco Customer	Chee			
<b>161</b>	2014-2017	Purchase Orders Subjects to Terms and Conditions - Verison , Motorola and others	SINCO024536; SINCO024537; SINCO024517; SINCO001255180; SINCO001166203; SINCO001261237; SINCO001174622;SI NCO001174624; SINCO001177227; DEFS_2369907- DEFS_2369916; SINCO030058- SINCO030060; SINCO029922; SINCO029923; SINCO029842; and SINCO029994	Sinco Customer	Chee	JM - Defs' Obj. (a)	FRE 803 (6) sampling of hundreds of thousands invoices	
<b>162</b>	6/8/2017	Email Liew to Google	MARK LIEW #3 000374	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>163</b>	6/11/2017	Email Liew to Google	MARK LIEW #3 000418	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>164</b>	6/14/2017	Email Liew to Google	MARK LIEW #3 000401	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>165</b>	6/15/2017	Email Liew to Google	MARK LIEW #3 000378	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>166</b>	6/15/2017	Email Liew to Google	MARK LIEW #3 000330	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>167</b>	6/17/2017	Email Liew to Google	MARK LIEW #3 000386	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>168</b>	6/19/2017	Email Liew to Google	MARK LIEW #3 000419	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>169</b>	6/20/2017	Email Liew to Google	MARK LIEW #3 000327	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>170</b>	6/24/2016	Email TJOA to Google	MARK LIEW #3 000496	Passing Off	Tjoa	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>171</b>	7/5/2017	Liew email to Google "SINCO sync"	Mark Liew#3 000329	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>172</b>	8/2/2017	Email Liew to Google	MARK LIEW #3 000399	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>173</b>	8/1/2017	Email Liew to Google	MarkLiew #3 000292	Passing Off	Liew	JM - Defs' Obj. (g)	FRE 803 (6) 804 (b)(3)	
<b>174</b>	3/11/2015	Email from SinCo to Juan De La Luz RE: camera bezel	SINCO000294-311	Sinco Customer	Chee			
<b>175</b>	12/2/2015	Email SINCO to Bose Tooling issue	SINCO517527-539	Sinco Customer	Chee	Defs' MIL 5	See. Opp to Mil. D.No. 5	
<b>176</b>	7/27/2016	Email between Cheryl and John re Quote to be sent to SinCo Singapore	SINCO001486616	Sinco Customer	Chee			
<b>177</b>	6/20/2015	Email from Liew re Verizon Logo	SINCO511299-303	Sinco Customer	Chee	Defs' MIL 5	See. Opp to Mil. D.No. 5	
<b>178</b>	9/8/2016	Purchase Order between Sinco Group and Project	SINCO001190799	Sinco Customer	Chee			
<b>179</b>	2/2/2018	Performa Invoice - Intel and SinCo	SINCO001464346-348	Sinco Customer	Chee			
<b>180</b>	12/8/2014	Email communication between Cy Ng and Eugene from swifttronic (Apple customer team where they inquire about an exchange that occurred where several project managers where arguing the email communication occurred between December 04, 2014 through December 08, 2014.	SINCO320905-909	Sinco Customer	NG			
<b>181</b>	10/26/2016	Email Comms. Re: Meeting with Google Team	ML000237-238	Sinco Customer	Liew			
<b>182</b>	4/1/2009	Email From Mark Liew to Gary Chang re Apple Bottom Case	SINCO613386-389	Sinco Customer	Liew	Defs' MIL 5	See. Opp to Mil. D.No. 5	
<b>183</b>	3/13/2014	Email Liew to SINCO RE: build plan	SINCO000291-293	Sinco Customer	Liew	Defs' MIL 5	See. Opp to Mil. D.No. 5	

**CONSOLIDATE TRIAL EXHIBITS**

<b>Exh. No.</b>	<b>DATE</b>	<b>DESCRIPTION</b>	<b>BATES Nos.</b>	<b>PURPOSE</b>	<b>SPONSER</b>	<b>Objections</b>	<b>Response</b>	<b>Court</b>
<b>184</b>	4/17/2014	Email from Liew to SINCO RE: UVPP logo	SINCO000450-458	Sinco Customer	Liew	Defs' MIL 5	See. Opp to Mil. D.No. 5	
<b>185</b>	1/11/2015	Email from Liew to Cy Ng RE: Kinzie and PPT presentation	SINCO000360-389	Sinco Customer	Liew			
<b>186</b>	1/23/2015	Email SINCO to Liew RE: Factory Visit	SINCO000528-529	Sinco Customer	Liew	Defs' MIL 5	See. Opp to Mil. D.No. 5	
<b>187</b>	1/26/2015	KINZIE part specification	SINCO001181321	Sinco Customer	Liew			
<b>188</b>	4/13/2015	Email from SINCo to Mark Liew on Kinzie project	SINCO000237-42	Sinco Customer	Liew			
<b>189</b>	6/24/2016	Amazon Factory visit	SINCO01845892-900	Sinco Customer	Liew			
<b>190</b>	3/30/2016	Fitbit visit	SINCO001759666	Sinco Customer	Liew	JM - Defs' Obj. (b)	FRE 803 (6)	
<b>191</b>	3/9/2018	Email from ML To Andy Lim regarding legal action filed by SinCo against Xingke 2016	ML000467-469	Notice	Tjoa			
<b>192</b>	3/19/2018	Email Tjoa to Google Xingke name change email from ML Tjoa registered in 2005	ML0000457	Trademark	Tjoa	JM - Defs' Obj. (h)	See. Opp to Mil. D.No. 6	
<b>193</b>	8/10/2018	Email from ML To Andy Lim re clarification on Jinlong Holding Vs. Jinglong Machinery Electronics	ML000449-452	Willful	Tjoa			
<b>194</b>	11/7/2017	Email from ML Tjoa to Patrick Wang re GSM Visit at Xingke	XK00010228-231	SinCo Customer	Tjoa			
<b>195</b>	2012-2018	Bose 2012-2018 12.6M	SINCO001821856	Sinco Customer	Chee	FRE 401/Foundation/Authenticity	FRE 803 (6), quality issue	
<b>196</b>	4/21/2016	Email Sales Trip in U.S.	SINCO01878380-82	SinCo Sales	Chee			
<b>197</b>	12/31/2010	SinCo 2010 Audited Report- Annual Financial Statement	SINCO000972816-972876	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	



## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>198</b>	12/31/2011	SinCo 2011 Audited Report- Annual Financial Statement	SINCO000972877-972936	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>199</b>	12/31/2012	SinCo 2012 Audited Report- Annual Financial Statement	SINCO001944302-1944358	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>200</b>	12/31/2013	SinCo 2013 Audited Report- Annual Financial Statement	SINCO001944359-1944414	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>201</b>	12/31/2014	SinCo 2014 Audited Report- Annual Financial Statement	SINCO001944415-1944464	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>202</b>	12/31/2015	SinCo 2015 Audited Report- Annual Financial Statements	SINCO577118-165	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>203</b>	12/31/2016	SinCo 2016 Audited Report- Annual Financial Statements	SINCO577166-215	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>204</b>	12/31/2017	SinCo 2017 Audited Report- Annual Financial Statement	SINCO000972987-973040	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>205</b>	12/31/2018	SinCo 2018 Audited Report- Annual Financial Statement	SINCO2196628	SinCo Sales	Chee	FRE 401/403/Hearsay	FRE 803 (6)	
<b>206</b>	12/31/2015	SinCo Financial Presentation	SINCO574924	SinCo Sales	Chee	Foundation/Hearsay	FRE 803 (6)	
<b>207</b>	7/9/2007	30(b)(6) Chee Depo Exh. 3		Policing	Chee			
<b>208</b>		Reserved						
<b>209</b>		Employee Handbook	SINCO576872-909	Employment	Chee			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>210</b>		SinCo presentation on Technical Support Enquiry	SINCO002179327-31	Employment	Chee	106. Attached to an email at SINCO002179327-28, which should be included.	Agreed	
<b>211</b>		Organization Chart - Dongguan Factory	SINCO001867859-60	Employment	Chee			
<b>212</b>		Humen Engineering Department Organization Chart	SINCO002011764	Employment	Chee			
<b>213</b>		SinCo Organization Chart	SINCO119985	Employment	Chee			
<b>214</b>		Reserved						
<b>215</b>	4/3/2019	SinCo Technologies Pte Ltd LinkedIn Profile viewed on 4/3/2019	Depo Ex.163	Trademark	Chee			
<b>216</b>		SinCo's Catalog Power Point	SINCO944224	Trademark	Chee			
<b>217</b>	1/9/2015	Humen Factory Photo	Depo Ex. 220	Trademark	Chee			
<b>218</b>	12/29/2008	FACEBOOK: "Boss singing"	SINCO743600	Lack of confusion	Liew			
<b>219</b>	5/31/2016	Debit Notes	SINCO038359-70	Lack of Confusion	Chee			
<b>220</b>	5/9/2006	Offer of Employment Liew	SINCO000908-15	Employment	Liew and Chee			
<b>221</b>	6/7/2006	Annual Leave and Other Record 2010	SINCO000645	Employment	Liew			
<b>222</b>	6/6/2013	Application for Employment: Mark Liew	SINCO000016 -21	Lack of confusion/ Mark Liew Employment	Liew			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>223</b>	6/10/2013	Letter of Employment: Mark Liew	SINCO000027-37	Employment Contract/ Mark Liew	Liew			
<b>224</b>	2013-2016	Payroll Report: Mark Liew	SINCO000042-83	Employment Lack of confusion	Liew			
<b>225</b>	7/8/2017	Yew Soon Liew LinkedIn profile	SINCO0000038	target U.S. customers	Liew			
<b>226</b>	12/31/2008	University Sponsorship for Mark	SINCO000086-88	Lack of confusion	Liew			
<b>227</b>	10/7/2014	Email from Liew to Cy Re: Travel Insurance	SINCO000399-405	Lack of confusion	Liew			
<b>228</b>	6/21/2015	Email from Liew to HR RE:SCM	SINCO000198-203	Lack of confusion	Liew			
<b>229</b>	6/18/2009	Performance Reviews	SINCO93628-33	Lack of confusion	Liew			
<b>230</b>	11/26/2009	Performance Reviews	SINCO067555-61	Lack of confusion	Liew			
<b>231</b>	7/31/2008	Liew Letter of Promotion	SINCO0000916	Employment	Liew			
<b>232</b>	7/25/2008	CERTIFICATION	SINCO0000924	Lack of confusion	Liew			
<b>233</b>	5/28/2008	IN-Principle Approval Letter for Employment Pass	SINCO000883-87	Lack of confusion	Liew			
<b>234</b>	11/30/2009	Mark Liew's Performance Appraisals/ Review	SINCO067555-561	Lack of Confusion	CY Ng and Liew			
<b>235</b>	11/20/2013	Mark Liew's Performance Appraisals/ Review	SINCO000971194-1204	Lack of Confusion	CY Ng and Liew			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>236</b>	6/7/2014	Mark Liew's Performance Appraisals/ Review	SINCO000971206-1217	Lack of Confusion	CY Ng and Liew			
<b>237</b>	12/13/2014	Mark Liew's Performance Appraisals/ Review	SINCO321367-378	Lack of Confusion	CY Ng and Liew			
<b>238</b>	Aug-Oct 2016	Mr. Liew's Pay Roll Report	SINCO00042-83	Lack of Confusion	Chee			
<b>239</b>		XINGKE paying Liew lawyer fee	MARK Liew 000233	Indemnification / Damages	Liew	JM - Defs' Obj. (i)	Credibility	
<b>240</b>	9/1/2015	Insurance Policy for Mark Liew and Cy Ng from SINCO	SINCO575097-575104	Lack of Confusion	CY Ng			
<b>241</b>	5/31/2016	Mark Liew Certificate by SINCO Grup Holdings	SINCO576174	Employment	Liew			
<b>242</b>	2/21/2016	Mr. Liew's Facebook posting	SINCO00040-41 and SINCO742600	Lack of Confusion	Liew			
<b>243</b>	3/23/2017	Mark Liew Response re Warning Letter	SINCO574671	Lack of Confusion	Liew			
<b>244</b>	6/3/2003	SinCO Employment Application RE: Cy Ng	Depo Exhibit 54	Lack of confusion	Cy Ng			
<b>245</b>	6/9/2003	OFFER OF EMPLOYMENT RE: Cy Ng	NG00010	Employment	Cy Ng			
<b>246</b>	4/28/2006	Loan Agreement RE: Cy Ng	SINCO33774-77	Lack of confusion/ Cy NG Employment	Cy Ng			
<b>247</b>	3/9/2009	NDA RE: Cy Ng	NG00030-31	Lack of confusion/ Cy NG Employment	Cy Ng			
<b>248</b>	August of 2003	Payroll Report: Cy NG	NG001-006	Lack of confusion	Cy Ng			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>249</b>	1/5/2011	Affidavit of Cy Ng SINGAPORE	SINCO574962-5080	Cy NG Employment	Cy Ng			
<b>250</b>	5/23/2015	Letter from SINCO's Human Resources Providing Ng with a copy of an employment agreement of a SINCO Engineer that reports to Cy Ng.	SINCO327629-637	Lack of Confusion	Cy Ng			
<b>251</b>	3/27/2014	Application Form of Eng Quek	SINCO577774	Employment	Seow Eng Quek			
<b>252</b>	7/11/2014	Letter of Confirmation- Quek	SINCO577796-800	Employment	Seow Eng Quek			
<b>253</b>	4/1/2015	Annual Leave & Other Leaves Record - Alan Quek Seow Eng	SINCO902606-902607	Employment	Seow Eng Quek			
<b>254</b>	7/18/2017	Email from Alan Quek to Bryan Lim regarding resignation letter of Quek Seow Eng	SINCO577507-577509	Employment	Seow Eng Quek			
<b>255</b>	7/19/2017	Employee Exit Interview Upon Termination Of Employment of Quek Seow Eng	SINCO577501-502	Employment	Alan Quek	FRE 401/403; hearsay when offered by Plaintiff	FRE 803 (6)	
<b>256</b>	2/12/2019	Detailed Payroll Report For April 2014 - Quek Seow Eng	SINCO000960988-971028	Employment	Seow Eng Quek			
<b>257</b>	5/26/2015	Employment Application Form of Yang Darui	SINCO576850-576870	Employment	Jerry Yang Darui			
<b>258</b>	5/29/2015	Letter of Employment Yang Darui	SINCO038306	Employment	Jerry Yang Darui			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>259</b>	2/12/2019	Detailed Payroll Report for June 2015 Of Yang Darui	SINCO971129-97115	Employment	Jerry Yang Darui			
<b>260</b>	5/30/2015	Email from Cy Ng to Cynthia Chua regarding job title of Jerry as Mechanical Engineer	SINCO038304-305	Employment	Cy Ng and Darui			
<b>261</b>	9/16/2015	Email from Cy Ng to Cynthia Chua regarding confirmation on Yang DaRui	SINCO325924	Employment	Cy Ng and Darui			
<b>262</b>	7/19/2017	Employee Exit Interview Upon Termination Of Employment of Yang Darui	SINCO577503-504	Employment	Jerry Darui and Cynthia	FRE 401/403; hearsay when offered by Plaintiff	FRE 803 (6)	
<b>263</b>	4/30/2009	RESIGNATION of Chang Wei Chong	SINCO053627	Cy Ng Eng. Dir. For SINCO	Cy Ng			
<b>264</b>	9/2/2016	Email Bryan Lim to Xu Shugong		Context to D751	CHee	Late Pretrial Exchange / Foundation	Responsive to 718, FRE 106	
<b>265</b>	6/1/2016	Email & Audit	SINCO002163816-2163821 [Native Excel]	Acquisition	Chee	JM - Defs' Obj. (n)	401 FRE 803 (6), 804 (b)(3)	
<b>266</b>	1/16/2010	RESIGNATION of Low Hian Foo	SINCO116572	Employment	Cy Ng			
<b>267</b>		Reserved						
<b>268</b>	4/18/2011	RESIGNATION of Yp Yeoh	SINCO276688	Employment	Cy Ng			
<b>269</b>	4/29/2011	RESIGNATION of Lau Hing Huei	SINCO279085	Employment	Cy Ng			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>270</b>	5/21/2011	RESIGNATION of Yeo Kim Leong	SINCO169248	Employment	Cy Ng			
<b>271</b>	6/7/2012	RESIGNATION of Mark Liew Yew Soon	SINCO000621	Employment	Liew			
<b>272</b>	6/28/2017	RESIGNATION Ng Yi Ming	SINCO329235	Employment	Cy Ng			
<b>273</b>	6/29/2017	RESIGNATION of Cy Ng	SINCO329231	Employment	Cy Ng			
<b>274</b>	6/19/2017	SINCO's other Embedded Employees Resignations: Ng Yi Ming	SINCO329235-36	Lack of Confusion	CY Ng			
<b>275</b>	7/13/2017	Jerry Yang Darui	SINCO329235-36 and SINCO575699- 700 (Resignation)	Lack of Confusion	CY Ng			
<b>276</b>	7/18/2017	Lim Chin Haun	Documents Provided by Email	Lack of Confusion	CY Ng			
<b>277</b>	7/21/2017	Larry Sim Teck Beng	Documents Provided by Email	Lack of Confusion	CY Ng			
<b>278</b>	5/1/2009	Resignations of following employees submitted to Cy Ng during his employment at SINCO: Chang Wei Chong Gary	SINCO053626-27	Lack of Confusion	Cy Ng			
<b>279</b>	8/18/2009	Moke Yuen Jong	SINCO101775-76	Lack of Confusion	Cy Ng			
<b>280</b>	9/2/2009	Ling Weng Choon	SINCO072902-03	Lack of Confusion	Cy Ng			
<b>281</b>	1/12/2010	Low Hian Foo	SINCO116571-72	Lack of Confusion	Cy Ng			
<b>282</b>	2/11/2010	Darren Aw	SINCO109763-65	Lack of Confusion	Cy Ng			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>283</b>	4/4/2011	YP Yeoh	SINCO276688-89	Lack of Confusion	Cy Ng			
<b>284</b>	4/14/2011	Lau Hing Huei	SINCO279085-86	Lack of Confusion	Cy Ng			
<b>285</b>	12/8/2010	Year End Appraisals of SINCO employees	SINCO003193	Employment	Cy Ng			
<b>286</b>	7/1/2013	Letter of Employment Sim Teck Beng	SINCO577824	Employment	Chee			
<b>287</b>	3/31/2014	Letter of Employment Quek Seow Eng	SINCO577784	Employment	Chee			
<b>288</b>	4/25/2014	Letter of Employment Lim Chin Haun	SINCO577609	Employment	Chee			
<b>289</b>	5/29/2015	Letter of Employment Yang Darui	SINCO38306	Employment	Chee			
<b>290</b>	5/8/2015	Letter of Employment Ng Yi Ming	SINCO576914	Employment	Chee			
<b>291</b>		KOTL Presentation	ML00000387	Trademark	Tjoa			
<b>292</b>		JinLong Presentation	ML00000508	Trademark	Tjoa			



## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>293</b>		Xingke Company Introduction	ML16998-ML17074	Trademark	Tjoa			
<b>294</b>		Xingke Company Introduction KOTL	XK00097-124	Trademark	Tjoa			
<b>295</b>	1/15/2018	Email from KOTL to Apple employee re Onsite Dry Run Review at Xingke	XK0002721-2727	Trademark	Tjoa			
<b>296</b>	2/28/2018	Xingke B196 Build Schedule Presentation	NG100858-860	Trademark	Tjoa			
<b>297</b>		XingKe's tool room expansion which shows a map of the factory compound	XK0000117	Trademark	Tjoa			
<b>298</b>	4/25/2018	Email from Tamal to ML re KOTL financial status and Xingke	XK0006497	Trademark	Tjoa	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>299</b>	11/29/2018	Email from KOTL To Bose clarifying Xingke is not affiliated with Sinco Technologies and it is a subsidiary of KOTL	NG261796-98	Trademark	Tjoa	DEFS_202374-DEFS_202375 contains native	Attachments no necessary, as produced	
<b>300</b>	6/30/2018	Jinlong Machinery &Electronics' Balance Sheet as of 2018	ML17286-17290	Trademark	Tjoa			
<b>301</b>	1/17/2019	Email from Eric to Apple employee re Xingke Introduction	XK00096	Trademark	Tjoa			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>302</b>	2019 Year	Jinglong 2019 Annual Operation Planning Presentation	ML0016642-667	Trademark	Tjoa			
<b>303</b>	2/12/2019	Sales & Marketing Org Chart	ML20308-20310	Trademark	Tjoa			
<b>304</b>	2/12/2019	S&M Report by Eric Pang	ML0016076	Trademark	Tjoa			
<b>305</b>	8/3/2017	Material Declaration Report Status: Google and Mark Liew KOTL	ML3000408	Trademark	Tjoa	FRE 106. Mark Liew # 000408 (Liew 154) is just one page of a longer email chain. SINCO791337-SINCO791340.	As Produced by Tjoa.	
<b>306</b>	10/10/2019	Announcement on Disciplinary Sanction Against Jinlong Machinery & Electronics Co., Ltd. and Related Parties-20191009		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>307</b>	7/31/2018	Announcement on Forced Reduction of Shares Owned by Controlling Shareholder-20180731		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>308</b>	11/20/2018	Announcement on Freezing in Sequence of Part of Shares Owned by Controlling Shareholder and Judicial Freezing of Part of Shares Owned by Persons Acting in Concert-20181120		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>309</b>	8/24/2018	Announcement on Freezing in Sequence of Part of Shares Owned by Controlling Shareholder-20180824		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	

**CONSOLIDATE TRIAL EXHIBITS**

<b>Exh. No.</b>	<b>DATE</b>	<b>DESCRIPTION</b>	<b>BATES Nos.</b>	<b>PURPOSE</b>	<b>SPONSER</b>	<b>Objections</b>	<b>Response</b>	<b>Court</b>
<b>310</b>	9/6/2018	Announcement on Freezing of Part of Funds in Bank Account-20180906		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>311</b>	9/14/2018	Announcement on Involvement of Dongguan Branch in a Legal Proceeding-20180914		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>312</b>	7/23/2018	Announcement on Judicial Freezing of Part of Shares Owned by Controlling Shareholder-20180723		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>313</b>	7/26/2018	Announcement on Judicial Freezing of Part of Shares Owned by Controlling Shareholder-20180726		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>314</b>	8/13/2018	Announcement on Judicial Freezing of Part of Shares Owned by Controlling Shareholder-20180813		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>315</b>	4/24/2019	Announcement on New Freezing in Sequence of Part of Shares Owned by Controlling Shareholder and Judicial Freezing of Part of Shares Owned by Person Acting in Concert-20190424		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>316</b>	3/22/2018	Announcement on Overdue Default for Part of Pledged Shares Owned by Controlling Shareholder-20180322		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>317</b>	4/13/2018	Announcement on Overdue Default for Part of Pledged Shares Owned by Controlling Shareholder-20180413		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>318</b>	7/25/2018	Announcement on Proposed Initiation of the Default Disposal Procedures for Part of the Pledged Shares Owned by Controlling Shareholder-20180725		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>319</b>	3/13/2018	Announcement on Proposed Initiation of the Default Disposal Procedures in Relation to Part of the Pledged Shares Owned by Controlling Shareholder-20180313		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>320</b>	2/28/2019	Announcement on Receipt of Notice from Wenzhou Intermediate People's Court-20190228		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>321</b>	12/21/2018	Announcement on Receipt of Warning Letter from Zhejiang Regulatory Bureau of CSRC by the Company and the Actual Controller-20181221		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>322</b>	4/27/2019	Announcement on Removal and Appointment of Company's General Manager-20190427		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>323</b>	4/27/2019	Announcement on Resignation of a Director-20190427		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>324</b>	4/26/2018	Announcement on the Completion of Debt Repayment by Controlling Shareholder Concerning Overdue Default in the Pledged Shares Deal-20180426		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	

# CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>325</b>	12/3/2018	Announcement on the Progress of Judicial Freezing and Freezing in Sequence of Part of Shares Owned by Controlling Shareholder-20181203		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>326</b>	4/9/2018	Announcement on the Progress of the Proposed Default Disposal Procedures for Part of the Pledged Shares Owned by Controlling Shareholder-20180409		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>327</b>	10/22/2018	Decision to Impose Disciplinary Sanction on Jinlong Machinery & Electronics Co., Ltd. and Related Parties-20181022		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>328</b>	5/25/2018	Pre-announcement on Possible Forced Reduction of Shares Owned by Controlling Shareholder-20180525		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>329</b>	6/5/2018	Pre-announcement on Possible Forced Reduction of Shares Owned by Controlling Shareholder-20180605		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>330</b>	4/16/2018	Jinlong Machinery and Electronics Co. Ltd. Stock Code 300032 Supplementary Correction Announcement-20180416		Willful	Judicial Notice	JM - Defs' Obj. (h)	Opp. MIL D. No. 6	
<b>331</b>	11/19/2015	Email from Bryan Lim to Xu Shugong re Cooperation	SINCO001821886	Factory Sales	Chee	JM - Defs' Obj. (k)	Def/ put at issue/damage s	
<b>332</b>	10/16/2015	Email from Xu Shugong to Bryan Lim re Land and Factory Building	SINCO0001863142	Factory Sales	Chee	JM - Defs' Obj. (k)	Def/ put at issue/damage s	
<b>333</b>	11/23/2015	Email from Xu Shugong to Bryan Lim re Cooperation	SINCO001863112-118	Factory Sales	Chee	JM - Defs' Obj. (k)	Def/ put at issue/damage s	
<b>334</b>	5/21/2019	LinkedIn Profile Of Eric Pang	Depo Ex. 241	Employment	Eric Pang			
<b>335</b>		LinkedIn Profile Of Gouki Gao	Depo Ex. 225	Employment	Gouki Gao			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>336</b>	8/17/2017	Email correspondence between Zhang Guanglei and Gouki regarding change of Xingke's Payment terms and instructing Xingke that they are not allowed to use SinCo's tools to customers without SinCo's knowledge.	Depo Ex.224	Factory Sales	Gouki Gao	Substantive Chinese; no translation provided; FRE 401/403; hearsay.	Provided	
<b>337</b>	8/21/2015	Email from Intel to Gouki and YM Ng re SinCo Visit	SINCO575890-91	U.S.Customer	Gouki Gao			
<b>338</b>	1/10/2017	Email from Gouki to Andy Lim	ML0000461	U.S.Customer	Gouki Gao	FRE 106. The entire email chain is ML0000459-62.	Agreed	
<b>339</b>	8/7/2018	Minh Declaration in support of SINCO's motion for preliminary injunction		U.S.Customer	Minh	JM - Defs' Obj. (c); Defs' MIL 4	See. Opp to Mil. D.No. 4	
<b>340</b>	3/22/2017	Dec. of CY NG ISO of Liew's Opp. To P's MTN for PI	N/a	Willful	Cy Ng	Defs' MIL 4	See. Opp to Mil. D.No. 4	
<b>341</b>	7/6/2018	Decl. of Ng in Opp to Motion for PI	N/a	Willful	Cy Ng	Defs' MIL 4	See. Opp to Mil. D.No. 4	
<b>342</b>	11/14/2016	Mark Liew Declaration ISO Def's Opp to P's Ex Parte Application	N/a	Willful	Judicial Notice/ Liew	Defs' MIL 4	See. Opp to Mil. D.No. 4	
<b>343</b>	4/23/2018	Mark Liew Declaration ISO Def's Opp to P's Motion for Evidentiary Hearing and Contempt	N/a	Employment	Judicial Notice/ Liew	Defs' MIL 4	See. Opp to Mil. D.No. 4	
<b>344</b>	7/19/2020	Declaration of Xu Shugong ISO Motion to Quash Service of summons		Availability of Witness	Xu Shugong	FRE 401/403/Hearsay	FRE 803 (8), availability	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>345</b>	11/13/2017	Email from Jerry Yang to Polar employee re SinCo presentation	NG6995	U.S.Customer	Jerry Darui	FRE 106. Ex. 735, an email sent to the same recipients the next day, identifying Defendants as "XingKe" should also be admitted for completeness.	Cross-examination	
<b>346</b>	11/1/2018	Email from Jerry Yang to Sonos re sonos	NG21317	U.S.Customer	Jerry Darui	No objections so long as the entire email chain is admitted. NG21317-NG21323	Agreed	
<b>347</b>	1/24/2019	Email from Jerry Darui Yang ro Cecilia re disaaporval of switch product	NG226223	U.S.Customer	Jerry Darui	FRE 401 and 403. Irrelevant whether this product was disapproved.	Quality, FRE 401	
<b>348</b>	7/28/2015	Email from Larry Sim re Amazon CSR	SINCO609641	U.S.Customer	Larry Sim			
<b>349</b>	8/26/2016	Email from Andrew Lim to Jon Chee re Amazon CSR	SINCO000970798	U.S.Customer	Jon Chee	JM - Defs' Obj. (n)	Notice/ sale of XINGKE	
<b>350</b>	7/23/2015	Email from Jon Chee to Deqiang Liu re new clients in different industries	SINCO001821895	U.S.Customer	Jon Chee	None. Defendants reserve right to admit its own Certified English translation.		
<b>351</b>	1/23/2019	Indemnification of Tjoa by Xingke	ML18473	Indemnification / Damages	Xingke and Tjoa	JM - Defs' Obj (i)	credibility	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>352</b>	May 2015 year	Image of 3456 Varnr Ct House	SINCO742599	Notice/ Damages	Tjoa	FRE 401/403	Intent, timing, location	
<b>353</b>	6/30/2016	3453 Varner Court Grant Deed	SINCO742621	Notice/ Damages	Tjoa	FRE 401/403	Intent, timing, location	
<b>354</b>	1/22/2019	Email from Tjoa re Department of tax and collections re varner Court Property	ML34065	Notice/ Damages	Tjoa	FRE 401/403	Intent, timing, location	
<b>355</b>	7/5/2005	TM File Wrapper for SINCO Registration No. 3188537		Trademark	Judicial Notice	Defs' MIL 2	See. Opp to Mil. D.No. 2	
<b>356</b>	7/5/2005	TM File Wrapper Proceedings for SINCO Registration No. 3188537		Trademark	Judicial Notice	Defs' MIL 2	See. Opp to Mil. D.No. 3	
<b>357</b>	8/6/2012	TM File Wrapper for SINCO Registration No. 4524165		Trademark	Judicial Notice	Defs' MIL 2	See. Opp to Mil. D.No. 4	
<b>358</b>	8/6/2012	TM File Wrapper Proceedings for SINCO Registration No. 4524165		Trademark	Judicial Notice	Defs' MIL 2	See. Opp to Mil. D.No. 5	
<b>359</b>	8/16/2012	TM File Wrapper for SINCO Registration No. 4524172		Trademark	Judicial Notice	Defs' MIL 2	See. Opp to Mil. D.No. 6	
<b>360</b>	8/16/2012	TM File Wrapper Proceedings for SINCO Registration No. 4524172		Trademark	Judicial Notice	Defs' MIL 2	See. Opp to Mil. D.No. 7	
<b>361</b>	8/16/2012	TM File Wrapper for SINCO Registration No. 4524173		Trademark	Judicial Notice	Defs' MIL 2	See. Opp to Mil. D.No. 8	



## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>362</b>	8/16/2012	TM File Wrapper Proceedings for SINCO Registration No. 4524173		Trademark	Judicial Notice	Defs' MIL 2	See Opp to Mil. D.No. 9	
<b>363</b>	10/26/2016	Sinco State Complaint		Trademark	Judicial Notice	JM - Defs' Obj. (j)	See Opp. to Def. MIL No. 5	
<b>364</b>	2/23/2018	SinCo's Second Amended Complaint		Trademark	Judicial Notice	JM - Defs' Obj. (j)	See Opp. to Def. MIL No. 5	
<b>365</b>	1/8/2021	Third Amended Cross Complaint -State		Trademark	Judicial Notice	Def's MIL 5	See Opp. to Def. MIL No. 5	
<b>366</b>	7/9/2007	Email from Chung re SinCo Holdings STD Logo	Depo Ex. 3 30(b)(6) Jon Chee	Trademark	Chee			
<b>367</b>	4/30/2011	Debit Note from SinCo Technologies	XK15851	Employment	Chee			
<b>368</b>	5/20/2010	Performa Invoice between SinCo and DG	SINCO001895412-414	Contract Manufacturer	Chee			
<b>369</b>	7/1/2005	Design Contract between Xingke Electronics and Dongguan Humen Yuan	SINCO001821997	Trademark	Deqiang Liu	FRE 401/403/Defs' MIL 2	See Opp. to Def. MIL No. 2. Intent, estoppel	
<b>370</b>	3/19/2007	Motorola NDA	SINCO577716-718	SinCo Customer	Chee			
<b>371</b>	12/28/2009	Motorola Purchase Order with SinCo	SINCO001508320	SinCo Customer	Chee			
<b>372</b>	2/5/2010	Motorola Purchase Order with SinCo	SINCO001653107	SinCo Customer	Chee			
<b>373</b>	8/25/2015	Email from Jon Chee to Xu Shugong re Meeting at Humen	SINCO001863131-34	Sale of factory	Chee	JM - Def's Obj. (k)	Intent, sale, license	

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>374</b>	10/30/2015	Email from Xu Shugong to Bryan Lim re Land and Factory Building	SINCO001865445-46	Sale of factory	Chee	JM - Def's Obj. (k)	Intent, sale, license	
<b>375</b>	10/30/2015	Email from Xu Shugong to Bryan Lim re Land and Factory Building	SINCO001865448-449	Sale of factory	Chee	JM - Def's Obj. (k)	Intent, sale, license	
<b>376</b>	12/6/2011	Email from Larry Sim to Lam Tak Sing re Hi-P and Sign off by Gao	SINCO002099527	Employment	Larry Sim			
<b>377</b>	12/28/2009	Motorola Purchase Order with SinCo	SINCO001508320	SinCo Customer	Chee			
<b>378</b>	10/6/2015	Verizon NDA	SINCO902738	SinCo Customer	Chee			
<b>379</b>	4/23/2010	Email from Engineering HQ re Weekley New Project Update	SINCO000984156	SinCo Customer	Chee			
<b>380</b>	4/17/2017	Jabil Purchase Order- Sinco	SINCO577243	SinCo Customer	Chee			
<b>381</b>	5/22/2015	SinCo Purchase Order with DG- Jabil	SINCO026591	SinCo Customer	Chee			
<b>382</b>	3/9/2018	Email from Tjoa to Google re SinCo and Xingke	ML0000467469	SinCo Customer	Chee	Defs' MIL 4; JM - Defs' Obj. (b)	See Opp. to Def. MIL 4	
<b>383</b>		Welcome to Sinco Introduction Power Point	ML0000297386	Trademark	Tjoa			
<b>384</b>	11/7/2017	Email from Tjoa to Apple re GSM Visit at XK	ML0003798	Trademark	Tjoa			
<b>385</b>	6/7/2018	Email from Tjoa re Xingke Capability Update	ML17326-17329	Trademark	Tjoa			
<b>386</b>	9/1/2018	Email from Tjoa to Google re Xingke Support from	ML20299-300	Trademark	Tjoa			

## CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
<b>387</b>	8/10/2018	Email from Tjoa to Andy Lim re Clarification on Jinlong Holding v. Jinlong Machinery Electronics	ML20393	Trademark	Tjoa	JM - Defs' Obj. (h)	See Opp. to Def. MIL 6	
<b>388</b>	9/18/2017	Dongguan Environmental Protection Bureau	SINCO577216	Trademark	Chee	JM - Defs' Obj. (d)	FRE 803 (6)	
<b>389</b>	11/19/2016	Singapore Police Report - Jon Chee	SINCO001865450	Willful	Chee	JM - Defs' Obj. (l)	Willful	
<b>390</b>	10/20/2017	Master Apple Restricted Project Agreement	SINCO001869845	Sinco Customer	Chee			
<b>391</b>	2009-2018	Customer Collection Record	SINCO001785377	Sinco Customer	Chee			
<b>392</b>	2013-2018	Xingke Slide Deck	XK25015-25041; XK25134-25201; XK25075-25131; XK24924-XK25013; XK25203-XK25279; XK25043-XK25073	Trademark	Tjoa/ Deqiang Liu			
<b>393</b>	7/6/1905	2014 NDA SINCO and Google	SINCO038256-57	SINCO Customer	Liew and Cy Ng	Wrong Bates. This is a Google NDA.	Corrected	
<b>394</b>	7/11/2019	KOTL Annual Report- Jinlong Machinery		Factory Sales	Judicial Notice			
<b>395</b>	5/3/2017	Xingke's Purchase Orders with Google	ML33061-3077	SINCO Customer	Tjoa			
<b>396</b>	11/1/2017	Central Provident Fund Contributions as to Cy Ng	SINCO962034-37	Employment	Chee	JM - Defs' Obj. (d)	Def's put at issue.	
<b>397</b>		<a href="https://www.cpf.gov.sg/Assets/Employers/Documents/WhoDoYouNeedToPayCPFFor.pdf">https://www.cpf.gov.sg/Assets/Employers/Documents/WhoDoYouNeedToPayCPFFor.pdf</a>	SINCO961993	Employment	Judicial Notice			
<b>398</b>	1/9/2020	Alan Cox Report and Exhibits	Provide to Counsel.	Damages	Alan Cox	JM - Defs' Obj. (m)	Opp. MIL D. No. 1	

CONSOLIDATE TRIAL EXHIBITS

Exh. No.	DATE	DESCRIPTION	BATES Nos.	PURPOSE	SPONSER	Objections	Response	Court
399		Amazon Audit	SINCO576271 [native]	Acquisition	Jon Chee	JM - Defs' Obj. (n)	FRE 803 (6)	
400 - 499		B L A N K						

TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
500	SINCO038359	SINCO038370	Various	Debit Notes issued by SinCo SG to SinCo DG	Liew and NG employment	SinCo SG			
501	DEFS_3862372	DEFS_3862379	5/28/2004	Criminal Charges	Impeachment	Judicial Notice	403 609 MIL 26	Def's Opp. to MIL 2 & 4	
502	DEFS_3862400	DEFS_3862402	5/28/2004	Statement of Facts for Criminal Case	Impeachment	Judicial Notice	403 609 MIL 26	Def's Opp. to MIL 2 & 4	
503	DEFS_3862381	DEFS_3862382	6/14/2004	Registrar's Certificate of Conviction	Impeachment	Judicial Notice	403 609 MIL 26	Def's Opp. to MIL 2 & 4	
504	SINCO000872	SINCO000875	5/2/2006	Liew Employment Application	Liew - Employment	Mark Liew CY Ng			
505	DEFS_0182577	DEFS_0182580	7/9/2007	Email from Chung to Chooi, Ng and Yap re SinCo Logo Usage	Naked License	SinCo SG CY Ng	106 0182576-580	Related writing inadmissible per FRE 502	
506	Deposition Exhibit	Deposition Exhibit	12/29/2008	Mark Liew Facebook Post re: Lim Singing Karaoke	Bryan Lim Relationship with XingKe	Mark Liew			
507	SINCO93628	SINCO93633	6/30/2009	Liew Performance Appraisal	Liew - Employment	Mark Liew CY Ng	106 SINCO093627	No objection to related writing	
508	SINCO008472	SINCO008473	10/17/2009	Ng-Liew Email re Factory Business	DG Meeting Minutes re Engineer Team	Mark Liew CY Ng			
509	SINCO002060591	SINCO002060612	10/21/2009	Email from Sim to Lim re SinCo Company Profile	SinCo - Company Materials	SinCo SG			
510	SINCO001371732	SINCO001371738	1/6/2010	Email from Loo (Swifttronic) to A. Lim re Swifttronic Project	Apple-Swifttronic-SG relationship	SinCo SG	401 403	Apple not SG's direct customer	
511	SINCO001376384	SINCO001376384	2/3/2010	Email from Chye to Teck	Customer - Swifttronic	SinCo SG	401 403	Apple not SG's direct customer	
512	SINCO001828806	SINCO001828808	3/3/2010	Emails between Larry Sim and SinCo Malaysia re Customer Requirements	SinCo-Employee Job Responsibilities	SinCo SG	401 403	Actual "embedded employee"	
513	SINCO001445779	SINCO001445781	4/12/2010	Internal SG email re Swifttronic Visit	Customer - Swifttronic	SinCo SG	401 403	Apple not SG's direct customer	
514	SINCO001094916	SINCO001094918	4/26/2010	Email from Yang to Lim re Camera Trim - Waiver W001487	Customer - Swifttronic/Apple	SinCo SG	401 403	DG dealing directly with SWFT	
515	SINCO000988304	SINCO000988305	6/9/2010	Email from Yang to A. Lim re Apple Price	SG-Swifttronic-Apple relationship	SinCo SG Bryan Lim	401 403	SG as "middleman" for DG and customer	
516	SINCO000988293	SINCO000988293	6/9/2010	Email from Lim to Tracy re Apple Price	Customer - Swifttronic/Apple	SinCo SG Bryan Lim	401 403	SG as "middleman" for DG and customer	
517	SINCO000990498	SINCO000990500	6/18/2010	Email from Lim to Tracy re Apple Price	Customer - Swifttronic/Apple	SinCo SG Bryan Lim	401 403	SG as "middleman" for DG and customer	
518	SINCO001445777	SINCO001445777	6/19/2010	Email from Tan (Swifttronic) to Lim re Customer Visit	Customer - Apple	SinCo SG	401 403	Apple not SG's direct customer	
519	SINCO000991699	SINCO000991701	6/20/2010	Email from Lim to Tracy re Apple Price	Customer - Swifttronic/Apple	SinCo SG Bryan Lim	401 403	SG as "middleman" for DG and customer	
520	SINCO001367492	SINCO001367496	6/24/2010	Email from Teng to Xu re audit	SinCo - Company Materials	SinCo SG	401 802	DG part of SinCo Holdings Group; SG adopted DG's statement. 802(d)(2)(B)	
521	SINCO001404829	SINCO001404830	7/5/2010	Swifttronic Purchase Order	Customer - Swifttronic	SinCo SG	401 802	Party admission; shows SG treating Apple/Swiftronic interchangeably	

TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
	SINCO001445778	SINCO001445778	9/27/2010	Email From Ng to Lim re / Apple GSM Visit POR	Customer - Swiftronic	SinCo SG	401 802	SWFT in charge of Apple account; Admission/SG adopted. 802(d)(2).	
522									
	SINCO001440050	SINCO001440053	10/14/2010	Swiftronic-SinCo Email re daily pipeline	Customer - Swiftronic	SinCo SG	401 802	Apple not SG's direct customer	
523									
	SINCO001440649	SINCO001440650	10/18/2010	Swiftronic-SinCo Email re daily pipeline	Customer - Swiftronic	SinCo SG	401 802	Apple not SG's direct customer	
524									
	SINCO954565	SINCO954566	11/11/2010	Meeting Minutes - Humen Management Meeting on 11 Nov 2010.	DG management records	SinCo SG Bryan Lim	401 802	Lim involved in DG affairs; party admission/SG adopted. 802(d)(2)(B)	
525									
	SINCO954559	SINCO954564	11/13/2010	Email from Sim to Lim regarding meeting minutes	DG management records	SinCo SG Bryan Lim	106 SINCO945456	No objection to related writing	
526									
	SINCO153718	SINCO153724	12/18/2010	SinCo-DG Emails re Customer Sample	SG-DG business relationship	Cy Ng Gouki Gao			
527									
	SINCO000971888	SINCO000971889	1/25/2011	Email From Xu to Lim re Meeting Notes	DG management records	SinCo SG Bryan Lim	106 translation 802	Party does not identify related writing; Translation was provided	
528									
	SINCO000971944	SINCO000971944	10/6/2011	Email From Lim to Xu re Investment	Bryan Lim's admissions regarding ownership of company	SinCo SG Bryan Lim	403 106	Shows Lim ownership/control of DG	
529									
	SINCO30b6DEPO0019	SINCO30b6DEPO0025	1/2/2012	Supply Agreement	SinCo SG and DG business relationship	SinCo SG Bryan Lim	106	Party does not identify related writing	
530									
	SINCO857107	SINCO857109	2/27/2012	Emails between Larry Sim and Andrew Lim re Apple transactions	SinCo-Apple Business Relationship	SinCo SG	401 802	Actual "embedded employee"	
531									
	Mark Liew 000226	Mark Liew 000229	7/25/2012	Sun Art Enterprises Ltd. Record	Bryan Lim Financial Relationship with DG	Bryan Lim	401 403	Lim owns SinCo Group Holdings	
532									
	SINCO002105474	SINCO002105478	9/11/2012	Emails between Larry Sim and Andrew Lim re Customer Requirements	SinCo-Employee Job Responsibilities	SinCo SG	401 403	Actual "embedded employee"	
533									
	SINCO002105807	SINCO002105810	9/17/2012	Emails between Larry Sim and Andrew Lim re Customer Requirements	SinCo-Employee Job Responsibilities	SinCo SG	401 403	Actual "embedded employee"	
534									
	SINCO791215	SINCO791221	10/18/2012	SinCo Electronics (Dongguan) Company Limited - Articles of Association	DG articles of association	SinCo SG Bryan Lim	106 401 403	Lim's access and control over DG	
535									
	SINCO576193	SINCO576199	10/18/2012	SinCo Electronics (Dongguan) Company Limited - Articles of Incorporation (English)	DG articles of incorporation	SinCo SG Bryan Lim	401 802	Lim control over DG; business record and party admission	
536									
	SINCO0000225	SINCO0000231	10/18/2012	Corporate Records	SinCo DG Articles of Association	SinCo SG Bryan Lim	401 802	Lim control over DG; business record and party admission	
537									
	DEFS_0000028	DEFS_0000033	10/18/2012	Board of Directors meeting	SinCo DG Board Resolution	SinCo SG Bryan Lim	401 802	Lim control over DG; Party Admission (Lim signed)	
538									
	SINCO576955	SINCO577011	12/31/2012	SinCo Technologies and its Subsidiaries Annual Financial Statements	SG corporate history and subsidiaries	SinCo SG Bryan Lim	401 802	Ex. 539 withdrawn	
539									
	DEFS_0018175	DEFS_0018190	5/17/2013	DG-Swiftronic Emails	Customer - Swiftronic	Cy Ng Gouki Gao	401 802	Direct dealings - DG and customer	
540									

TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
541	SINCO000025	SINCO000026	7/6/2013	Ng-Cynthia Chu Emails re Hire of Liew	Liew - Employment	Cy Ng			
542	DEFS_0022114	DEFS_0022121	6/12/2013	Swifttronic-Sinco Emails re Apple color matching	Customer - Swifttronic	Cy Ng Gouki Gao	401	DG dealing directly with customer	
543	ML00000516	ML00000518	6/17/2013	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Intel pre-existing DG customer	
544	DEFS_0182719	DEFS_0182721	6/17/2013	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Intel pre-existing DG customer	
545	ML00000519	ML00000522	6/24/2013	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Intel pre-existing DG customer	
546	DEFS_0182800 SINCO000971998	DEFS_0182801 SINCO000971999	6/26/2013 10/17/2013	Intel Purchase Order to DG Email re: China vs. Singapore Sinco Companies	Customer - Intel Customer - Intel	Cy Ng SinCo SG Bryan Lim	106 401 403	Intel pre-existing DG customer No objection to related writing	
547	DEFS_0182734	DEFS_0182737	11/6/2013	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 106 401 403		
548	XK24869	XK24872	9/4/2014	The DG-SinCoo Lease	Provisional - If Defs' MIL No. 3 denied	Mark Liew Cy Ng	106 include file name.	Intel pre-existing DG customer Only if Defs' MIL 3 is denied	
549	SINCO860057	SINCO860057	2/28/2014	Email from Low to Sim re Amazon Social Audit	Customer - Amazon	SinCo SG	106 missing attachment SINCO860058-094	No objection to related writing	
550									
551	DEFS_0182751 DEFS_0182832	DEFS_0182752 DEFS_0182834	3/8/2014 5/1/2014	Intel Purchase Order to DG Intel Purchase Order to DG	Customer - Intel Customer - Intel	Cy Ng Mark Liew	106 401 403 106 401 403	Intel pre-existing DG customer Intel pre-existing DG customer	
552	SINCO672746	SINCO672747	7/9/2016	SG-DG Emails	SG-DG business relationship	Minh Nguyen Sinco SG			
553	SINCO000342	SINCO000456	5/20/2014	DG-Swiftronic Emails	Customer - Swifttronic	Mark Liew	106 401 403	Pre-existing DG/SWFT relationship	
554	NG0002074	NG0002074	5/26/2014	Chee's Introduction to Xu (China)	Jon Chee role at SG and DG	Jon Chee			
555	SINCO000972011	SINCO000972013	6/11/2014	Email from Lim to Gao and Xu re Apple order	Customer - Apple	SinCo SG Bryan Lim			
556	SINCO000972009	SINCO000972009	6/5/2014	Email from Lim to Gao and Xu re Apple Project	SG-Apple relationship	SinCo SG Bryan Lim	106	No related writing identified	
557	SINCO000972015	SINCO000972015	7/16/2014	Email from Lim to Xu re Dividend	Lim's financial relationship with Xu	SinCo SG Bryan Lim	106 403 401	No related writing identified; Lim profits off DG	
558	SINCO001446245	SINCO001446247	9/21/2016	Swifttronic / SinCo Technologies	SG-Swiftronic-Apple	Jon Chee	106	No related writing identified	
559	SINCO001446240	SINCO001446244	9/21/2016	Apple-Swiftronic Agreement	Customer - Apple	Jon Chee	106	No related writing identified	
560	SINCO001446239	SINCO001446244	9/21/2016	Swifttronic-Apple Master Restricted Project Agreement	Customer - Apple	Jon Chee	SINCO001446238-247	No objection to related writing	
561	DEFS_0182842	DEFS_0182844	11/25/2014	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Pre-existing DG and Intel relationship	
562	DEFS_0182914	DEFS_0182918	1/20/2015	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Pre-existing DG and Intel relationship	
563									
564	SINCO320883	SINCO320886	12/5/2014	Email from Ng to Lim re calls	Customer - Apple	Cy Ng			
565	SINCO321436	SINCO321439	12/15/2014	Sinco factory PM/engineer	SinCo SG and DG business	Jon Chee			

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	DEFS_0183300	DEFS_0183306	3/9/2015	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Pre-existing DG and Intel relationship	
566									
	DEFS_0183240	DEFS_01833244	3/13/2015	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Pre-existing DG and Intel relationship	
567									
	SINCO001910264	SINCO001910298	Year 2015	SinCo CSR Meeting - Motorola 2015	SG-Motorola relationship	SinCo SG	106 SINCO013705	No objection to related writing	
568									
	DEFS_0182731	DEFS_0182733	4/17/2015	Intel Purchase Order to DG	Customer - Intel	Cy Ng	106 401 403	Pre-existing DG and Intel relationship	
569									
	DEFS_0183336	DEFS_0183339	3/8/2015	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	106 401 403	Pre-existing DG and Intel relationship	
570									
	SINCO000972026	SINCO000972026	6/17/2015	Email from Xu to Lim re Invitation (to visit)	Bryan Lim financial interest in Sinco DG	Bryan Lim Jon Chee	106 SINCO097202	No objection to related writing	
571									
	SINCO000972024	SINCO000972024	42180	Email from Xu to Lim re Invitation (to visit)	Bryan Lim financial interest in Sinco DG	Bryan Lim Jon Chee	106 SINCO0972023-24	No objection to related writing	
572									
	SINCO002045222	SINCO002045223	7/2/2015	SinCo Email re Factory Visit	Customer - Bose	Cy NG	106 missing	See Ex. 575	
573									
	SINCO902606	SINCO902607	Year 2015	Leave record - Alan Quek	Alan Quek - Employment	Cy NG			
574									
	SINCO002045224	SINCO002045224	5/8/2015	SinCo Tour Agenda	Customer - Bose	Cy NG	106 out of context	Does not explain how out of context. Underlying email being introduced as exhibit.	
575									
	SINCO001821878	SINCO001821881	8/25/2015	Email from Chee to Xu re Meeting at Humen	Sale of DG	Jon Chee			
576									
	SINCO001863136	SINCO001863137	9/17/2015	Xu-Chee Email re DG acquisition; Xu-Lim Emails re Negotiation	Sale of DG	SinCo SG Jon Chee	106 SINCO001863	No objection to related writing	
577									
	SINCO001863139	SINCO001863140	9/28/2015	Xu-Lim-Chee-Yap Emails re sale of DG and related due diligence	Sale of DG	SinCo SG Jon Chee	106 SINCO001863 131-42	No objection to related writing	
578									
	SINCO001865443	SINCO001865443	10/30/2015	Email from Xu to Lim re Bonus & Interest	Lim financial relationship with Xu	SinCo SG Bryan Lim	401 403 106 SINCO001865442	No objection to related writing; relevant to show Lim profits of Xu/DG	
579									
	SINCO001943769	SINCO001943771	11/19/2015	Email from Lim to Shugong (SinCo) re Cooperation	Sale of DG	Bryan Lim Jon Chee		Relevant to show Xu's terms and conditions of sale; non-hearsay due to legal operative facts, state of mind, effect on listener and party admission/adoption (Lim received consideration from deal)	
580									
	SINCO001821988	SINCO001821994	11/23/2015	Email from Xu to Lim re Jinlong Acquisition	Sale of DG	Bryan Lim Jon Chee	401 403 802	Relevant to show Xu's terms and conditions of sale; non-hearsay due to legal operative facts, state of mind, effect on listener and party admission/adoption (Lim received consideration from deal)	
581									
	Deposition Exhibit	Deposition Exhibit	12/10/2015	Ng-Chee visits Sinco-Bose Agenda	Customer - Bose	Jon Chee	802		
582									



TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
583	SINCO00146227	SINCO00146231	10/9/2016	SinCo Group - Sales Revenue	SG customers	SinCo SG Jon Chee			
584	SINCO945232	SINCO945232	5/9/2016	Zhuai Chi Cheng's Customers	SinCo-DG Business Relationship	Minh Nguyen			
585	SINCO742596	SINCO742596	1/6/2016	Email from Swifttronic to SinCo re Quote	Customer - Swifttronic	SinCo SG	401 403	SWFT -- not SG -- was Apple's direct customer	
586	SINCO001468146	SINCO001468149	1/15/2016	Email from Chung to Looi (Intel) re Sinco RFQ	Customer - Intel	SinCo SG			
587	SINCO001468271	SINCO001468271	1/19/2016	Meeting Minutes - Intel Visit to SCM	Customer - Intel	Jon Chee	401 403 106 SINCO001468270-271	SG and DG competing for Intel: no objection to identified related writing being introduced	
588	SINCO001468269	SINCO001468270	1/19/2016	Email from Eu to Chee re Intel Meeting Minutes	Customer - Intel	Jon Chee	401 403 106 SINCO001468270	No objection to related writing. Relevant to show Chee's admission and that SG and DG compete for Intel	
589	SINCO001468324	SINCO001468326	1/20/2016	Email from Intel to Jon Chee re Manufacturing	Customer - Intel	Jon Chee	401 403 duplicate	Duplicate not identified. Relevant to show SG and DG competing for Intel	
590	SINCO001468493	SINCO001468495	1/21/2016	Email from Richter to Ng re Sinco Supplier Selection	Customer - Intel	Jon Chee Deqiang Liu			
591	SINCO001468433	SINCO001468435	1/21/2016	Email from Eu to Looi (Intel) re and Mechanical Supplier Selection	Customer - Intel	Jon Chee	401 403	Intel's pre-existing relationship with DG; impeachment	
592	SINCO001468422	SINCO001468423	1/21/2016	Email from Richter to Ng re Sinco Supplier Selection	Customer - Intel	Jon Chee	401 403	Intel's pre-existing relationship with DG; impeachment	
593	SINCO001468398	SINCO001468399	1/21/2016	Email from Richter to Chee re and Mechanical Supplier Selection	Customer - Intel	Jon Chee	401 403	Intel aware that DG and SG were separate entities and competing for customers	
594	SINCO001468533	SINCO001468538	1/22/2016	Email from Khouri (Intel) to Chee	Customer - Intel	Jon Chee	401 403	The remainder of the writing does not correct a misleading impression. Also, details why DG failed is unfairly prejudicial. FRE 403.	
595	SINCO001850151	SINCO001850153	1/26/2016	Email from Lim to Chavarri re CAP	Customer - Amazon	SinCo SG	401 403 106 SINCO002166696-698	Pre-existing DG and Intel relationship	
596	DEFS_0183836	DEFS_0183850	2/4/2016	Intel Purchase Order to DG	Customer - Intel	Cy Ng Mark Liew	401 403	SG and DG competing for Intel	
597	SINCO001474287	SINCO001474288	2/15/2016	Email from Eu to Khouri (Intel) re Awaiting your feedback on the following	Customer - Intel	Jon Chee	401 403 106 SINCO001474		
598	SINCO937864	SINCO937864	1/17/2016	Email from Ng to Nguyen re Conference Call	Customer - Motorola	Minh Nguyen			
599	SINCO001475230	SINCO001475232	2/18/2016	Email from Knox (Intel) to Eu re SinCo Technologies - Account Opening	Customer - Intel	Jon Chee	401 403	Intel originally DG's customer	
600	SINCO001476871	SINCO001476871	2/26/2016	Email from Knox (Intel) to Chee re Official Report	Customer - Intel	Jon Chee	401 403	Intel originally DG's customer	
601	SINCO937015	SINCO937015	2/29/2016	Email from Nguyen to Schlicksup (Motorola) re Dinner with Jon Chee	Customer - Motorola	Minh Nguyen	401 403		

TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
	Deposition Exhibit	Deposition Exhibit	3/22/2016	Google-SinCo Emails	Customer - Google	Minh Nguyen			
602	SINCO001478706	SINCO001478708	3/5/2016	Email from Richter (Intel) to Eu re SinCo Technologies - Account Opening	Customer - Intel	SinCo SG	401 403	Intel originally DG's customer	
603	SINCO001876889	SINCO001876891	3/18/2016	Internal Email re Lenovo's structure	Customer - Lenovo	Jon Chee	401 403	Knowledge of change of customer	
604	DEFS_0183861	DEFS_0183876	3/18/2016	Intel Purchase Order to DG	Customer - Intel	Cy Ng	401 403	Intel originally DG's customer	
605	DEFS_0183879	DEFS_0183894	3/24/2016	Intel Purchase Order to DG	Customer - Intel	Cy Ng	401 403	Intel originally DG's customer	
606	XK26577	XK26579	3/29/2016	Verizon Purchase Order No. 8500382037	Verizon-DG relationship	Mark Liew			
607	SINCO610442	SINCO610443	3/29/2016	Email from Amazon to L. Sim re Amazon Social Responsibility	Customer - Amazon	Cy Ng	401 403	Show Customer's Audit and timeline	
608	SINCO941671	SINCO941788	3/30/2016	Nguyen email attaching SinCo Portfolio to customer and attachment	SinCo's representations to customers	Minh Nguyen SinCo SG			
609	DEFS_0184017	DEFS_0184018	4/8/2016	Records re: Hong Kong / San Jose, CA Company	Customer - Verizon	Cy Ng			
610	DEFS_0182714	DEFS_0182714	4/14/2016	Records re: Black Diamond, WA	DG sales to US Customer	Mark Liew	106 401 403	Circumstantial evidence of oral license	
611	SINCO001877865	SINCO001877871	4/20/2016	Email from M. Nguyen re Private and Confidential	SinCo - Customer Acquisition	Minh Nguyen			
612	SINCO944222	SINCO944340	4/20/2016	Minh Nguyen's email regarding SinCo Company overview brochure	SinCo - Company Materials	Minh Nguyen	Redundant to Exh. 529	Ex. 529 is a different exhibit	
613	SINCO945226	SINCO945226	5/8/2016	Email from Chin to Chee re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	SinCo SG Jon Chee	401 403	SG admissions in prospectus are relevant to causation	
614	SINCO945229	SINCO945231	5/9/2016	Email from Wee to Nguyen re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Minh Nguyen	401 403	SG admissions in prospectus are relevant to causation	
615	SINCO001865308	SINCO001865311	5/9/2016	Email from Chin to Chuen re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Jon Chee	401 403	SG admissions in prospectus are relevant to causation	
616	SINCO001865296	SINCO001865298	5/9/2016	Email from Chua to Wee re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Minh Nguyen	401 403	SG admissions in prospectus are relevant to causation	
617	SINCO001865272	SINCO001865278	5/11/2016	Email from Nguyen to Chua re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Minh Nguyen	401 403	SG admissions in prospectus are relevant to causation	
618	SINCO001865377	SINCO001865382	5/12/2016	Email from Chua to Nguyen re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Minh Nguyen	401 403	SG admissions in prospectus are relevant to causation	
619	SINCO001865344	SINCO001865348	5/12/2016	Email from Chua to Cheun re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Minh Nguyen Jon Chee	401 403	SG admissions in prospectus are relevant to causation	
620	SINCO001865271	SINCO001865280	5/11/2016	SG communications concerning Acquisition Prospectus re Zhuhai CC	SinCo - Customer Acquisition	Minh Nguyen Jon Chee	401 403	SG admissions in prospectus are relevant to causation	
621	SINCO945389	SINCO945427	5/13/2016	Acquisition Prospectus	SinCo - Customer Acquisition	Minh Nguyen Jon Chee	401 403	SG admissions in prospectus are relevant to causation	
622	SINCO945383	SINCO945388	5/13/2016	Email re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Minh Nguyen Jon Chee	401 403	SG admissions in prospectus are relevant to causation	
623	SINCO001865428	SINCO001865433	5/13/2016	Email from Chee to Chua re Zhuhai Acquisition Prospectus	SinCo - Customer Acquisition	Jon Chee	401 403 106 (Part 1)	SG admissions in prospectus are relevant to causation	
624									

DEFENDANTS' EXHIBIT LIST (500-896)  
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TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
625	SINCO945476	SINCO945518	5/19/2016	Acquisition Prospectus	SinCo - Customer Acquisition	Jon Chee Minh Nguyen	401.403.106 (Part 2a)	SG admissions in prospectus are relevant to causation	
626	SINCO945470	SINCO945475	5/19/2016	Email from Chua to Cheun re Acquisition Prospectus (Top Secret) Zhuhai CC	SinCo - Customer Acquisition	Jon Chee Minh Nguyen	401.403.106 (Part 2b)	SG admissions in prospectus are relevant to causation	
627	SINCO001878619 DEFS_0002160	SINCO001878619 DEFS_0002162	5/21/2016 5/23/2016	Email from Nguyen to Lim re SinCo Singapore Verizon Purchase Order No. 8500389813	Customer - Google Verizon-DG relationship	Minh Nguyen Cy Ng Mark Liew			
628	SINCO945534	SINCO945534	5/23/2016	Email from Cheryl EU to M. Nguyen re [Google] Brief Meeting Summary	Customer - Google	Minh Nguyen	106 SINCO945534-39	No objections to related writing	
629	SINCO945536	SINCO945537	5/24/2016	Email from Chuen to Eu re Silicone Ring Part	Google-DG-SG relationship and timeline	Minh Nguyen	106 SINCO945534-39	No objections to related writing	
630	SINCO001878919	SINCO001878919	5/31/2016	Email from Lim to Nguyen re Motorola	SG-Motorola relationship	Minh Nguyen	401.403	Motorola went through ZCC, not SG	
631	DEFS_0007105	DEFS_0007111	6/21/2016	Change to Purchase Order No. 8500392880 Verizon and SinCo	Verizon-DG relationship	Cy Ng Mark Liew			
632	SINCO001878851	SINCO001878852	5/21/2016	Lim-Nguyen Email re SinCo Singapore	Customer - Google	Minh Nguyen			
633	SINCO001846048	SINCO001846053	6/23/2016	Email from Low to Lim re Amazon Visit	SinCo-DG Business Relationship	SinCo SG			
634	SINCO001846016	SINCO001846022	6/23/2016	Email from Low to Liu re Amazon Visit	SinCo-DG Business	SinCo SG			
635	ML18342 / DEFS_2047758	ML18342 / DEFS_2047758	6/24/2016	Google's A. Lim emails ML Tjoo regarding a project	Customer - Google	ML Tjoo	401.106 Missing Attachment ML17306-08	Google dealing directly with KOTL	
636			6/24/2016	Tjoo-Google Emails re Drawings	Customer - Google	ML Tjoo			
637	Deposition Exhibit SINCO001875784	Deposition Exhibit SINCO001875784	6/27/2016	Email from Nguyen from Chee re Customers	SG Customers	Jon Chee			
638	SINCO001446633	SINCO001446633	7/4/2016	Email from Chua to Chee re and Past 3 Years Apple Orders	SG customers	Jon Chee		SG treating SWFT/Apple interchangeably	
639			7/9/2016	Google-SinCo Emails re	Customer - Google	Mark Liew	401		
640	SINCO0672746	SINCO672747	7/13/2016	Emails between Chee to Nguyen re ZCC Status and Motorola News	Customer - Motorola	Jon Chee	401.403	Alternative explanation for decreased sales unrelated to allegations	
641	SINCO743022	SINCO743028	7/14/2016	SinCo Internal Emails re Capabilities	Customer - Google	Minh Nguyen			
642	SINCO001845546	SINCO001845550	7/26/2016	Email from Chavarri to Zhang re CSR	Customer - Amazon	SinCo SG	401.403	Defendants withdraw Ex. 643	
643	SINCO945758	SINCO945764	7/28/2016	Email - Minh Nguyen and Google re	Customer - Google	Minh Nguyen	401.106 Attachment Missing	SG and DG competing separately for Google; no objection to remainder of writings	
644	SINCO945739	SINCO945741	7/29/2016	SinCo Quote for Project	Customer - Google	Minh Nguyen	401.106 Attachment Missing	Timeine for project; no objection to remainder of writing	
645	SINCO001878944	SINCO001878944	7/29/2016	Emails between Apple and Sinco	Customer - Apple	Minh Nguyen	SINCO0947 42-106 Attachment Missing 944-949	No objections to remainder of writing	
646									

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TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
647	SINCO001878949	SINCO001878949	7/29/2016	Emails between Apple and Sinco	Customer - Apple	Minh Nguyen	106 Attachment Missing 944-949	No objections to remainder of writing	
648	SINCO001878944	SINCO001878944	7/29/2016	Email from Maura (Apple) to Nguyen re Introducing SinCo	Customer - Apple	Minh Nguyen	106 Attachment Missing 944-949	Defendants withdraw Ex. 648	
649	SINCO945557	SINCO945558	7/30/2016	Email from Chee to Nguyen re Introducing SinCo	Customer - Apple	Minh Nguyen			
650	SINCO001878941	SINCO001878942	7/29/2016	Email from Chee to Nguyen re Introducing SinCo	Customer - Apple	Minh Nguyen	106 Attachment Missing	Plaintiff did not provide attachment in discovery.	
651	SINCO935566	SINCO935577	8/1/2016	Email from Nguyen to Yen re project	Google-DG-SG relationship and timeline	Minh Nguyen	401 403	Timeline: non-infringement explanation why SG lost client	
652	SINCO001875624	SINCO001875625	8/1/2016	Email from Maura to Nguyen re Introducing SinCo	Customer - Apple	Minh Nguyen		Timeline: non-infringement explanation why SG lost client	
653	SINCO935021	SINCO935034	8/5/2016	Email from Lim to Nguyen re project	Google-SinCo relationship	Minh Nguyen	401 403	Timeline: non-infringement explanation why SG lost client	
654	SINCO001845455	SINCO001845456	8/5/2016	Email from Low to Sime re Amazon Social	Customer - Amazon	SinCo SG	401 403	Timeline of audit	
655	SINCO934946	SINCO934958	8/6/2016	Email from Eu to Lim re project	Customer - Google	Minh Nguyen		Timeline: non-infringement explanation why SG lost client	
656	SINCO934574	SINCO934588	8/8/2016	Email from Boilard to Nguyen re project	Customer - Google	Minh Nguyen	401 403	Timeline: non-infringement explanation why SG lost client	
657	SINCO001875440	SINCO001875442	8/8/2016	Email from W. Rochowicz (Apple) to M. Nguyen re Introducing SinCo	Customer - Apple	Minh Nguyen	401 106 Attachment Missing	Timeline: non-infringement explanation why SG lost client; Plaintiff did not provide attachment in discovery.	
658	SINCO934351	SINCO934363	8/9/2016	Email from Nguyen to Eu re project	Customer - Google	Minh Nguyen	401 403	Timeline: non-infringement explanation why SG lost client	
659	SINCO001875258	SINCO001875258	8/10/2016	Nguyen email re	Apple-SG relationship	Minh Nguyen	106 403	Admission Apple was never direct client	
660	SINCO933972	SINCO933972	8/11/2016	Email from Lim to Eu re Pricing	Google-SinCo relationship	Minhn Nguyen	106 403	Timeline: non-infringement explanation why SG lost client	
661	SINCO001845369	SINCO001845374	8/15/2016	Email from Zhang to Neo re CSR	Customer - Amazon	SinCo SG	403	Defendants withdraw Ex. 662	
662	SINCO001845329	SINCO001845334	8/15/2016	Email from Low to Amazon/Lab 126 re Amazon Visit	SinCo-DG Business Relationship	SinCo SG			
663	SINCO001845296	SINCO001845297	8/15/2016	Emails from Chee re Acquisition Prospectus	SG revenue and capabilities	Jon Chee		SG lost customers for non-infringement reason as revealed in attachment	
664	SINCO001885971	SINCO001885981	8/16/2016	Lim's Letter to SinCo DG re Board Meeting	SinCo SG and DG business	ML Tjoo	106 401		
665	SINCO001831742	SINCO001831748	9/9/2016	Email attaching Lim's Letter to SinCo DG re Board Meeting	SinCo SG and DG business communications	ML Tjoo Bryan Lim Jon Chee	106 Attachment Missing	Attachments do not correct any misleading impression and alternatively inadmissible under FRE 403.	
666	ML18417 / DEFS_2336233	ML18418 / DEFS_2336234	8/20/2016	Tjoo-Lim Email re SinCo Dongguan	Customer - Google	ML Tjoo			

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	SINCO926221	SINCO926221	8/22/2016	Email From Eu to Nguyen re Project	SG's capabilities	Minh Nguyen	401 106 Attachment Missing 222-228	SG loss of project unrelated to TM infringement; no objection to attachment being admitted into evidence	
667	SINCO925687	SINCO925687	8/24/2016	Eu-Nguyen Email re Google	Customer - Google	Minh Nguyen		Goes directly to show extrinsic evidence of terms of oral agreement and lack of customer confusion by the key customer at issue in the case. Highly probative and relevant to central issues in case; no "unfair" prejudice.	
668	SINCO925644	SINCO925646	8/25/2016	Chee-Nguyen Email re Google	Customer - Google	Jon Chee Minh Nguyen	403		
669	SINCO925640	SINCO925642	8/25/2016	Chee-Nguyen Email re Google	Customer - Google	Jon Chee Minh Nguyen	401 403	Goes directly to show extrinsic evidence of terms of oral agreement and lack of customer confusion by the key customer at issue in the case. Highly probative and relevant to central issues in case; no "unfair" prejudice.	
670	SINCO001874338	SINCO001874341	8/26/2016	Email between Low to Nguyen re SinCo Meeting	Customer - Amazon	Jon Chee Minh Nguyen	401 403	Non-infringement reason why SG lost customer	
671	SINCO001844301	SINCO001844302	9/7/2016	Email from Chavarri to Low re Amazon Social Responsibility Audit	Customer - Amazon	SinCo SG	403	Non-infringement reason why SG lost customer	
672	SINCO001005967	SINCO001005967	9/7/2016	Email from Chee to Lim re Market News	SinCo SG's future business plans	Jon Chee	403 106 Attachment Missing	No objection to attachment coming into evidence. Relevant to show SG's sophistication and awareness of what its "competitors" were doing, including DG.	
673	SINCO000973041	SINCO000973042	9/20/2016	Litigation document between Swiftronic and Sinco	Swiftronic-Sinco SG business relationship	Bryan Lim Jon Chee	106 401 403 Pleading unsigned draft	Explains SG's decreasing sales with SWFT unrelated to TM infringement	
674	SINCO917510	SINCO917516	9/21/2016	Email from Chee to Nguyen re SinCo Dongguan	DG management records	Jon Chee	106 403	No objections to attachment coming into evidence. Admissions by SG that it was aware DG sold to KOTL.	
675	SINCO001843836	SINCO001843838	9/22/2016	Email from Low to Sim re Amazon Audit	Customer - Amazon	SinCo SG		Probative to central issue in case - customer was not confused or stolen; rather, customer disqualified both SG and DG, explaining lost sales.	
676	SINCO000973150	SINCO000973172	9/23/2016	Litigation document between Swiftronic and Sinco	Swiftronic-Sinco SG business relationship	Bryan Lim Jon Chee	403	Plaintiff redacted document before disclosure; relevant to show SWFT's bias against SG and explains why it chose to work with DG instead	
677	ML20288	ML20289	9/23/2016	Lim-Ng Email	Customer - Google	ML Tjoa	401 106- The Exhibit is Redacted	Google dealing directly with DG	

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679	SINCO001843767	SINCO001843767	9/26/2016	Email From Low to Chee and Lim re Amazon CSR Audit	Customer - Amazon	Jon Chee			
680	SINCO001843684	SINCO001843686	9/26/2016	Email from Low to Liu re Amazon CSR Audit	Customer - Amazon	SinCo SG			
681	SINCO001843663	SINCO001843664	9/27/2016	Email from Low to Chee re Postponing of Amazon CSR audit	Customer - Amazon	SinCo SG			
682	SINCO001843635	SINCO001843637	9/28/2016	Email from Chee to Low re Amazon CSR Audit	SG-Amazon relationship	Jon Chee	106 401 403	Explains non-infringement reason why SG lost customer	
683	SINCO001843525	SINCO001843527	10/6/2016	Memorandum to SinCo Technologies Pte Ltd. Clients	SinCo - Company Materials	Jon Chee	106 401 403 (Part 3b)	Highly probative - reveals Amazon knew SG/DG separate entities and SG told the same to all its customers	
684	SINCO001843524	SINCO001843524	10/6/2016	Memorandum	Customer - Amazon	Jon Chee	106 (Part 3a) 401 403	Reveals Ex. 683 was sent on Oct. 6, 2016	
685	SINCO001446228	SINCO001446228	10/9/2016	Email from Lim to Chee re Apple Information	SG customers	Jon Chee	106 SinCo SINCO001446 228-232	No objections to attachment coming into evidence	
686	DEFS_0010574	DEFS_0010579	10/15/2016	Verizon Purchase Order No. GA1610077A	Customer - Verizon	Mark Liew Cy NG	401 403 106 DEFS_	Pre-existing relationship with DG	
687	SINCO327745	SINCO327745	10/19/2016	Email from Ng to Chee re Bose	Customer - Bose	Jon Chee			
688	DEFS_0130930	DEFS_0130973	10/20/2016	Google-DG MSA (Master Purchase Agreement)	Customer - Google	Cy NG Mark Liew ML Tjoa			
689	SINCO001872647	SINCO001872647	10/21/2016	Email from Nguyen to Chee re Potential Possibility in Zhuhai	SinCo-DG Business Relationship	Jon Chee	Duplicative 401 106	Explains lost sales	
690	SINCO001491891	SINCO001491894	10/21/2016	Clarification of SinCo Structure	SG and DG Agreement regarding license	Bryan Lim SinCo SG			
691	SINCO001872630	SINCO001872631	10/22/2016	Email from Chee to Nguyen re Potential Possibility in Zhuhai	SinCo-DG Business Relationship	Jon Chee			
692	SINCO915451	SINCO915452	10/25/2016	Eu-SG Personnel Email re Google project	Customer - Google	Minh Nguyen			
693	SINCO001843233	SINCO001843233	10/26/2016	Sales Revenue Amazon/Kyocera/Mobility	SG Customer Revenue	Jon Chee	106 (Part 4b)	Inconsistent sales info	
694	SINCO001843232	SINCO001843232	10/26/2016	Email from EU to Chee re SinCo Sales	SG Customer Revenue	Jon Chee	106 (Part 4a)	Inconsistent sales info	
695	DEFS_2369917	DEFS_2369920	1/5/2017	Email between DG sales and Desmond Chin	SinCo SG and DG business communications	SinCo SG			
696	SINCO915080	SINCO915081	11/10/2016	Email from Nguyen to Chee re Bose Message	Bose-SG relationship	Jon Chee Minh Nguyen	106 403	Reason why Bose chose DG over SG unrelated to TM infringement	
697	DEFS_2369905	DEFS_2369906	11/22/2016	Email from Nancy Wenlan Chen to Desmond Chin	SinCo SG and DG business communications	SinCo SG	26 MIL 106 401 403 802	Def's Opp. to No. 2; adoption. Ex. 52 is an MSA with Google.	
698	DEFS_2369917	DEFS_2369920	12/3/2016	Letter to Customers Providing Company Information	DG Company Information	SinCo SG ML Tjoa Cy NG Mark Liew	SinCo See Exhibit 52		

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699	NG0002155	NG0002155	12/8/2016	Email from Gao to Ng forwarding email from Yap	DG-SG relationship	Cy Ng	Incomplete 401 See Exhs. 219 and 500 duplicative	Relevant to show control of employees. Not duplicative of Debit Notes	
700	SINCO001445776	SINCO001445776	12/9/2016	Email from Lim to Chee re Apple Visit	Customer - Apple	Jon Chee	106 attachments missing 777 - 781	Agree to include attachments.	
701	DEFS_0014755 / NG0002074	DEFS_0014755 / NG0002074	12/9/2016	Email from Gby to Ng re Introduction	Chee-Xu communications re Chee's Role	Jon Chee			
702	SINCO000972477	SINCO000972477	12/10/2016	Email from Chee to Bose re Memorandum of Updates in SinCo Technologies	Customer - Bose	Jon Chee	106 (Part 5a)	Remainder of writing not identified	
703	DEFS_0010581	DEFS_0010581	12/10/2016	KOTL Company Overview - Jinlong Machinery & Electronics to Bose	Customer - Bose	ML Tjoa Cy Ng	106 (Part 6a)	Remainder of writing not identified	
704	SINCO00970429	SINCO00970430	12/17/2016	Email from Tjoa to Ng re KOTL visit to Bose	Customer - Bose	Cy Ng ML Tjoa			
705	SINCO038443	SINCO038443	12/31/2016	SinCo Group Sales by Customer Group	SG customers	Sinco SG			
706	SINCO574671	SINCO574671	Year 2017	Mark Liew Resignation Letter	Notice of Mark Liew's resignation	Mark Liew			
707	NG98490	NG98491	1/25/2017	Certificate of Change of Name - XingKe (Hong Kong)	DG Name Change	ML Tjoa Cy Ng Mark Liew	106 Translation?	Exhibits contains English translation	
708	SINCO0970447	SINCO0970456	2/10/2017	Email from Parma to Ng re Project for Bose	Customer - Bose	Cy Ng ML Tjoa	802	Non-hearsay: customer state of mind and knowledge that it was dealing with KOTL; email subject says "KOTL"; non-confusion	
709	SINCO002177006	SINCO002177008	2/20/2017	Email from G. Ng and L. Sim re Nespresso Program	Nespresso-SG Business relationship	Sinco SG		These are different email chains. FRE 403's standard is "needlessly" cumulative.	
710	SINCO002176411	SINCO002176413	2/22/2017	Email from L. Sim to G. Ng re Nespresso "Responsible Sourcing Audit" program - support needed	Nespresso-SG Business relationship	Sinco SG	redundant to Exh. 741	These are different email chains. FRE 403's standard is "needlessly" cumulative.	
711	SINCO328785	SINCO328788	2/23/2017	Amazon Email re CSR Audit	Customer - Amazon	Cy Ng			
712	SINCO002047073	SINCO002047075	2/24/2017	Email from Ng to Chavarri regarding Amazon Tool Transfer	Customer - Amazon	Cy Ng Minh Nguyen			
713	SINCO000972465	SINCO000972467	3/8/2017	Email from A. Low to R. Chavarri re Amazon SR Audit & Training Notification (CH+EN) - Sinco Electronics DG Notice re XingKe	Customer - Amazon	Sinco SG			
714	SINCO672837	SINCO672839	3/10/2017	Sinco Electronics DG Notice re XingKe Electronics	DG-SG communications	Sinco SG			
715	SINCO000667	SINCO000668	3/16/2017	Mark Liew's Response to Warning	Notice of Mark Liew's resignation	Mark Liew	106 SINCO00667-669 802	No objections to remainder of writing	
716	SINCO000668	SINCO000669	3/16/2017	Photo of SinCo Sign Logo on Building	Use of SinCo Mark	Mark Liew Cy Ng	106 SINCO00667-669 802	No objections to remainder of writing	

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	SINCO00980265	SINCO00980279	4/3/2017	Swifttronic-Sinco SG	Customer - Swifttronic	Bryan Lim Jon Chee		Limited purpose to show falling out between SG and SWFT. FRE 408(b) exception for bias (SWFT against SG and decision to switch suppliers), a non-infringement explanation for decreased sales.	
717							401 403 408 802 106		
	SINCO00972019	SINCO00972019	4/28/2017	Lim and Xu communications re Transfer of Funds	Bryan Lim ownership and control of DG	Bryan Lim	106 SINCO009720 19-20 401 403	No objections to remainder of writing	
718									
	SINCO00980537	SINCO00980539	4/30/2017	Debit Notes issued by SinCo	Embedded Employee Issue	SinCo SG Cy NG	401 See Exhs. 219, 500 and 725 duplicative	Not duplicative. Covers different timeframe and contains additional admissions by SG	
719									
	SINCO012431	SINCO012431	6/17/2017	Lim-Liew Email re metal grille	Customer - Google	Mark Liew Cy NG			
720									
	SINCO576934	SINCO576934	6/19/2017	Email from Ng to Andy Lim	Google-Xingke Business relationship	Mark Liew Cy NG			
721									
	Deposition Exhibit	Deposition Exhibit	7/19/2017	Financial History Record	Impeachment	Jon Chee	802 106 401 403	Impeachment	
722									
	Mark Liew #3 000295 / SINCO001944233	Mark Liew #3 000296 SINCO001944235	8/2/2017	Liew-Ng Google Emails	Customer - Google	Mark Liew			
723									
	SINCO791337	SINCO791340	8/3/2017	Emails between Google and Mark Liew	Use of Xingke mark	Mark Liew			
724									
	SINCO576936	SINCO576943	8/12/2017	Emails between Google and Xingke	Use of Xingke mark	Cy NG			
725									
	DEFS_0142938	DEFS_0142938	3/21/2018	Questions regarding a speaker mod email	Customer - Motorola	Mark Liew Cy NG	106 no attachments	Agree to include attachments. Relevant for non-confusion.	
726									
	DEFS_0131010	DEFS_0131010	10/19/2017	DG "Certificates of Compliance" as Supplier for CUSTOMER	Customer - Motorola	Mark Liew Cy NG	106 missing email and related attachments	Agree to use DEFS_0142938 and all attachments.	
727									
	DEFS_0111686	DEFS_0111687	10/24/2017	Xingke-Lenovo Emails re program	Customer - Motorola/Lenovo	Mark Liew			
728									
	DEFS_0258141	DEFS_0258179	11/3/2017	DG email to Google regarding Xingke Company Presentation	Xingke-Google relationship	Mark Liew Cy NG			
729									
	NG249977	NG249977	11/3/2017	DG email to Google regarding Xingke Company Presentation, including attachment	Xingke-Google relationship	Mark Liew Cy NG	106 (Part 7a)	Agree to use native. DEFS_0258141-42	
730									
	NG249978	NG250015	11/3/2017	Xingke Company Introduction	Xingke-Google relationship	Mark Liew Cy NG	106 (Part 7b) Native should be used	Agree to use native. DEFS_0258141-42	
731									
	SINCO910579	SINCO910581	11/7/2017	Nguyen Email re SinCo Employment Agreement	Sinco Employment Contract	Mihn Nguyen Jon Chee	106 no attachments 401 403 privacy	No objection to include attachment; contains admission by SG that it realized its employee agreements caused confusion	
732									



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	ML19101	ML19105	11/7/2017	Tjoo-Apple Emails re Meeting Minutes	Customer - Apple	ML Tjoo	Doesn't match cite ML18885-19422	Cites do match (also at DEFS_0659791)	
733									
734	ML17491	ML17491	11/7/2017	KOTL-Apple Emails re Samples	Customer - Apple	ML Tjoo			
	DEFS_0186568	DEFS_0186637	11/14/2017	Email from Darui to Polar with XingKe intro slides-Email from Yang to Polar with attachments, including powerpoint	Customer Interaction	Mark Liew CY Ng			
735						Jerry Da Rui	106 568-635	No objections to remainder of writing	
736	DEFS_0186577	DEFS_0186635	11/14/2017	XingKe Company Presentation	Customer Interaction	Mark Liew	106 568-635	No objections to remainder of writing	
			11/14/2017	linlong Machinery & Electronics Company Presentation	Customer Interaction	Mark Liew CY Ng	Subsumed in Exh. 770	Def's will withdraw Ex. 737	
737	DEFS_0186569	DEFS_0186576				Jerry Da Rui			
738	SINCO909938	SINCO909940	11/28/2017	Email from Chee to Eu re Google Visit	Customer - Google	Jon Chee			
	SINCO575127	SINCO575128	12/4/2017	Internal Sinco SG emails regarding status of employees	SinCo SG communications with customer	SinCo SG Jon Chee		Customer preference to work with employee who left SinCo; undermines causation.	
739							401		
	DEFS_0148499	DEFS_148505	12/4/2017	LCS Rear housing 85 label needed	XingKe-Lenovo business relationship	Mark Liew Cy NG	401 802	Non-Hearsay: customer state of mind - notice that companies separate; non-confusion	
740									
741	DEFS_0137630	DEFS_0137688	12/13/2017	Attachement: XingKe Company Introduction	XingKe-Motorola relationship	Mark Liew	106 (Part 8b)	No other writing identified	
742	DEFS_0111537	DEFS_0111539	12/13/2017	Email from CH Lim (XingKe) to Lee	XingKe-Motorola relationship	Mark Liew	106 (Part 8a)	No other writing identified	
743	SINCO001870840	SINCO001869941	1/14/2018	SinCo Balance Sheet Year 2014 to 2016	Customer - Apple	Jon Chee	106	No objections to remainder of writing	
	XK00002720	XK00002727	1/15/2018	Apple - Tjoo emails: Onsite Dry Run Review at XingKe on 1/17	Customer - Apple	ML Tjoo	106 XK002716-2727	No objections to remainder of writing	
744									
745	DEFS_0112916	DEFS_0112920	1/18/2018	Morotola-XingKe Emails re XingKe lighting project	Customer - Motorola	Mark Liew		Non-Hearsay: customer state of mind - notice that companies separate; non-admissions	
	SINCO913238	SINCO913240	1/24/2018	Email from Nguyen to Eu re New SinCo Factory in Zhuhai	SinCo SG production capabilities	Minh Nguyen	802	Not redundant - contains updated admissions	
746									
747	DEFS_2384281	DEFS_2384319	2/2/2018	Welcome to XingKe Presentation	XingKe-Google relationship	Cy Ng Gouki Gao	26 MIL	Def's Opp to MIL 2	
	DEFS_2384234	DEFS_2384280	2/2/2018	XingKe Company Introduction	XingKe-Google relationship	Cy Ng Gouki Gao	26 MIL	Def's Opp to MIL 2	
748									
749	DEFS_2384233	DEFS_2384233	2/2/2018	Email from Liew (XingKe) to Sabharwal (Google) re Thank you for visit to XingKe	XingKe-Google relationship	Cy Ng Gouki Gao	26 MIL	Def's Opp to MIL 2	
	NG260985 /	NG260988 /	5/21/2018	Email from Mark Liew to Eric Pang	XingKe-Bose Business relationship	Mark Liew CY Ng			
750	DEFS_2341310	DEFS_2341313							
	DEFS_0153881	DEFS_0153892	5/31/2018	Emails re Bose-Intricon Order Shift - Order Transfer	Customer - Bose	Mark Liew		Non-Hearsay: customer state of mind - notice that companies separate; non-confusion	
751							802	other writing not identified	
	SINCO001870840	SINCO001870841	7/20/2018	Email re SinCo financial information	Customer - Apple	Minh Nguyen Jon Chee	106		
752									
753	SINCO913615	SINCO913617	7/28/2018	Jabil-SinCo Email re Mexico	SG - Jabil	Minh Nguyen Jon Chee			
	ML0016642	ML0016667	10/19/2018	linglong Annual Operations Planning	Reveals customer presentation	ML Tjoo Deqiang Liu	401	Non-confusion	
754									

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755	DEFS_0198888	DEFS_0198890	11/6/2018	DG email to Ruwido regarding Xingke Company Presentation; and two powerpoint presentations	DG-Ruwido relationship	Cy NG Gouki Gao	106 401	Non-confusion	
756	NG254027	NG254028	11/21/2018	Email From Tan to ycb (KOTL) re Logi SER qualification: KOTL (Xingke)/CAP due Nov. 21, 2018 (WED)	Xingke-Customer relationship	Cy NG	NOT FOUND	Sent on 9/11/2021	
757	DEFS_0201943	DEFS_0201947	11/23/2018	Email form Guolun (KOTL) to Jaburek (Ruwido) re Audit Report	Xingke-Customer relationship	Cy NG Gouki Gao	106 943-948	No objections to remainder of writing	
758	NG252435	NG252436	11/29/2018	Email from Tan (Apple) to Sow (KOTL) re Tooling KO	Xingke-Customer relationship	Cy NG	802	Non-hearsay: customer state of mind/effect on listener - not confused	
759	NG130477	NG130483	11/30/2018	Email from Lim (KOTL) to Pang (KOTL) re New Bose Project	Xingke-Customer relationship	Cy NG	802	Non-hearsay: customer state of mind/effect on listener - not confused	
760	NG227571	NG227574	12/4/2018	Email from Gillett (Google) to Tan (KOTL) re Update Request	Xingke-Customer relationship	Cy NG	802	Non-hearsay: customer state of mind/effect on listener - not confused	
761	DEFS_0206114	DEFS_0206115	1/12/2019	Email from Liew (KOTL) to McCarthy re Speckled Parts from Xingke	Xingke-Customer relationship	Cy NG			
762	Def's MIL No. 2, Ex. H	Def's MIL No. 2, Ex. H	3/4/2019	Article re Patent Agent Fights Identity Theft	Provisional - If Defs' MIL No. 2 denied	Judicial Notice			
763	Deposition Exhibit	Deposition Exhibit	4/2/2019	SinCo Holding Snapshot-Company overview	SinCo - Company Materials	SinCo SG Judicial Notice	802 401 403	Business record/public filing/judicial notice	
764	Deposition Exhibit	Deposition Exhibit	4/2/2019	SingCo Group Holdings PTE Snapshot - Singapore Business Directory	SinCo Name - Other Companies	SinCo SG Judicial Notice	802 401 403	Business record/public filing/judicial notice	
765	Deposition Exhibit	Deposition Exhibit	4/4/2019	Florida-Google Map	SinCo SG Business	Jon Chee Judicial Notice	802 401 403	Contradicts allegations in complaint	
766	Fed. Dkt. [269], Ex. C to 9/25/19 John Giust Declaration	Fed. Dkt. [269], Ex. C to 9/25/19 John Giust Declaration	4/11/2019	Corporate history re: Dongguan Sinco Silicone Rubber Producing Co., Ltd. (including English Translation)	Liew and NG not plaintiff's employees	Judicial Notice	802 401 403	Business record/public filing/judicial notice	
767	Exchanged on 9/9/2021	Exchanged on 9/9/2021	7/2/2019	English Translation of Court Mediation Document] Xingke DG v. Beijing Yig Intellectual Property Agency- Mediation Agreement	Provisional - If Defs' MIL No. 2 denied	SinCo DG Judicial Notice			
768	DEFS_3798383	DEFS_3798386	7/2/2019	Court Mediation Document] Xingke DG v. Beijing Yig Intellectual Property Agency- Mediation Agreement	Provisional - If Defs' MIL No. 2 denied	Judicial Notice SinCo DG	401 403 MIL	No forgery; Defs' Opp to MIL 2	
769	See attached files	See attached files	9/26/2020	Form 10-K Apple Inc.	Customer - Apple	Judicial Notice	401	Location of customer / oral license	
770	See attached files	See attached files	12/26/2020	Form 10-K Intel Corporation	Customer - Intel	Judicial Notice	401	Location of customer / oral license	
771	See attached files	See attached files	12/31/2020	Form 10-K Amazon.com, Inc.	Customer - Amazon	Judicial Notice	401	Location of customer / oral license	
772	See attached files	See attached files	12/31/2020	Form 10-K Alphabet Inc. (Google)	Customer - Google	Judicial Notice	401	Location of customer / oral license	

TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
773	See attached files	See attached files	12/31/2020	Form 10-K Verizon Communications Inc.	Customer - Verizon	Judicial Notice	401	Location of customer / oral license	
774	See attached files	See attached files	3/21/2021	Annual Report FY21 4Q Kyocera Corporation	Customer - Kyocera	Judicial Notice	401	Location of customer / oral license	
775	See attached files	See attached files	3/31/2021	Form 10-K Flex Ltd.	Customer - Flex	Judicial Notice	401	Location of customer / oral license	
776	See attached files	See attached files	6/28/2021	Swiftronic Federal Corporation Information	Customer - Swiftronic	Judicial Notice	401	Location of customer / oral license	
777	See attached files	See attached files	7/29/2021	Certificate of Good Standing Motorola Mobility	Customer - Motorola	Judicial Notice	401	Location of customer / oral license	
778	See attached files	See attached files	8/25/2021	Ruwido Austrica gmbh webpage	Customer - Ruwido	Judicial Notice	401	Location of customer / oral license	
779	See attached files	See attached files	2/2/2021	Annual Report Bose MA SoS	Customer - Bose	Judicial Notice	401	Location of customer / oral license	
780	See attached files	See attached files	8/31/2021	Sinco Turn-Key Manufacturing webpage USA	Use of SinCo logo by other companies	Judicial Notice	401 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
781	See attached files	See attached files	8/31/2021	Sinco Data Processing Systems USA	Use of SinCo logo by other companies	Judicial Notice	402 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
782	See attached files	See attached files	8/31/2021	Sinco Automation Pte Ltd. Singapore	Use of SinCo logo by other companies	Judicial Notice	403 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
783	See attached files	See attached files	8/31/2021	Sinco Capital Pte Ltd. Singapore	Use of SinCo logo by other companies	Judicial Notice	404 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
784	See attached files	See attached files	8/31/2021	Sinco Consulting & Technology Pte Ltd. Singapore	Use of SinCo logo by other companies	Judicial Notice	405 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
785	See attached files	See attached files	8/31/2021	Sinco Edutech Pte Ltd. Singapore	Use of SinCo logo by other companies	Judicial Notice	406 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
786	See attached files	See attached files	8/31/2021	Sinco Inc. (Brand developer) USA	Use of SinCo logo by other companies	Judicial Notice	407 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
787	See attached files	See attached files	8/31/2021	Sinco Shipping Pte Ltd. Singapore	Use of SinCo logo by other companies	Judicial Notice	408 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
788	See attached files	See attached files	8/31/2021	Sinco Sala Inc. (Construction equipment) USA	Use of SinCo logo by other companies	Judicial Notice	409 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
789	See attached files	See attached files	8/31/2021	SincoPet (Pet products) USA	Use of SinCo logo by other companies	Judicial Notice	410 403 802	Abandonment/likelihood of confusion Non-hearsay purpose	
790	SINCO673306	SINCO675826	2010-2017	Sinco-Swiftronic Purchase Orders	SinCo-SWIFT-Apple Business	Chee			
791	DEFS_0008476	DEFS_0010037	2013-2015	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	401 403 802	Expansive oral license	

DEFENDANTS' EXHIBIT LIST (500-896)  
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TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
792	DEFS_0008373	DEFS_0008373	2/21/2017	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	402 403 802	Expansive oral license	
793	DEFS_0008372	DEFS_0008372	12/13/2013	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	403 403 802	Expansive oral license	
794	DEFS_0005747	DEFS_0005747	4/19/2017	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	404 403 802	Expansive oral license	
795	DEFS_0005745	DEFS_0005745	2/22/2017	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	405 403 802	Expansive oral license	
796	DEFS_0004158	DEFS_0004158	12/31/2013	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	406 403 802	Expansive oral license	
797	DEFS_0004157	DEFS_0004157	8/7/2013	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	407 403 802	Expansive oral license	
798	DEFS_0005612	DEFS_0005612	8/3/2015	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	408 403 802	Expansive oral license	
799	DEFS_0005578	DEFS_0005578	6/30/2014	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	409 403 802	Expansive oral license	
800	DEFS_0182689	DEFS_0182689	2013-2017	Records re: Black Diamond, WA	DG Customer - Kee	Cy NG	410 403 802	Expansive oral license	
801	SINCO000971419	SINCO000971437	2016-2017	Salary statements for Cy Ng	SinCo-DG Business Relationship	Cy NG	See Exh. 248		
802	SINCO945430	SINCO945468	None	[Redline] Acquisition Prospectus	SinCo SG attempt to purchase factory	Minh Nguyen Jon Chee	802 401 403	801(d)(2); SG admits losing customers at issue for reasons unrelated to infringement. Pg. 82.	
803	SINCO945233	SINCO945233	undated	Zhuhai Chi Cheng's Marketing Materials	SinCo-DG Business Relationship	Jon Chee Minh Nguyen	106 missing attachments and email 229-265	No objections to remainder of writing	
804	SINCO945110	SINCO945111	undated	Zhuhai Acquisition Doc - Customer Projections	SG production capabilities	Jon Chee Minh Nguyen			
805	SINCO601313	SINCO601313	undated	SinCo Corporate Structure chart	SinCo Corporate Structure	SinCo SG	106 SINCO601305 - 313	No objections to remainder of writing	
806	SINCO576261	SINCO576270	undated	SinCo brochure "Moulding the Future"	SG's Company Overview	Lim / Chee / Nguyen			
807	Deposition Exhibit	Deposition Exhibit	Undated	SinCo Pharmaceuticals Logo	SinCo Name - Other Company	Judicial Notice	802 401 403	Abandonment/use by other companies	
808	Deposition Exhibit	Deposition Exhibit	Undated	Newspaper Article	Impeachment	Judicial Notice Jon Chee	403 609 MIL	Def's Opp to MIL 4	
809	Deposition Exhibit	Deposition Exhibit	Undated	SinCo Group Snapshot	SinCo Group Corporate History	SinCo SG			
810	SINCO000938	SINCO000982	Various	Payroll reports for Mark Liew from Sinco	Liew - Employment	SinCo SG Mark Liew	See Exh. 238		
811	SINCO645	SINCO645	Year 2010	Mark Liew Annual Leave Record	Liew - Employment	Mark Liew CY Ng	See Exh. 238		
812	SINCO002111406	SINCO002111407	Year 2011	Apple Suppliers List 2011	SinCo SG not listed as Apple Supplier	Judicial Notice			
813	SINCO001367497	SINCO001367515	6/24/2010	SinCo Group Holdings Company Profile	SinCo - Company Materials	SinCo SG			
814				IRS Revenue Ruling 59-60, Section 4, Approach to Valuation, Section 3.01. 47 IRS Revenue Ruling 59-60, Section 4, Factors to Consider 2(b). "IRS Revenue Ruling 59-60, Section 4, Factors to Consider 2(g)	Basis for expert opinion	Hank Kahrs	401 MIL	Articles exchanged during expert discovery	

TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
815				Commercial Damages - A Guide to Remedies in Business Litigation, Matthew Bender & Co., Inc., 2015, 51:03 [1]	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
816				Evans, Elizabeth A. and Simon, Peter. P., Litigation Services Handbook: The Role of the Financial Expert, 6th Ed., John Wiley & Sons, Inc., 2017, pp. 19-7 - 19-8	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
817				Daniel, Brian M. and Froemming, John G., Calculating and Proving Damages, Release 6, Law Journal Press, 2015, pp. 7-2 - 7-3	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
818				Glick, Mark A., Intellectual Property Damages: Guidelines and Analysis, John Wiley & Sons, Inc., 2003, pp. 329-334	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
819				Boushie, Kristopher A.; Spadea, Christopher H.; and. Cunniff, Martin F., Calculating and Proving Damages, Release 6, Law Journal Press, 2015, p. 1-7	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
820				The Comprehensive Guide to Lost Profit Damages, 2009 Ed., (Business Valuation Resources, LLC, 2009), pp. 13-2 — 13-3	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
821				James O'Brien, CPA, CFF, and Greg Stillman, Esq., Performing Credible Lost Profits Analyses, The Comprehensive Guide to Economic Damages (Business Valuation Resources, LLC, 2018), p. 226	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
822				Stacey Udell, CPA/ABV/CFF, CVA, Projecting But-For Profits, The Comprehensive Guide to Economic Damages (Business Valuation Resources, LLC, 2018), p. 246	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
823				Vanderhart, Jennifer, Calculating and Proving Damages, Release 6, Law Journal Press, 2015, p. 5-12.	Basis for expert opinion	Hank Kahrs	MIL	Articles exchanged during expert discovery	
824	DEFS_0182654	DEFS_0182669		Chinese 2017 JUN ETA Sinco Dongguan JinLong Wenzhou Runze & Liming Lin	Corporate History	SinCo DG Judicial Notice	MIL	Produced before close of discovery	
825	DEFS_0182651 Exchanged on 9/9/2021	DEFS_0182653		Chinese 2016 OCT ETA Sinco Dongguan & Liming Lin	Corporate History	SinCo DG Judicial Notice	MIL	Produced before close of discovery	
826	Exchanged on 9/9/2021			Chinese 2016 OCT ETA Grand Fortune & Liming Lin	Corporate History	SinCo DG Judicial Notice	401 403 802 MIL	Business Record	
827	Exchanged on 9/9/2021			Chinese 2016 APR ETA Wenzhou Runze & Sinco Holdings	Corporate History	SinCo DG Judicial Notice	401 403 802 MIL	Business Record	
828	Exchanged on 9/9/2021		Year 2020	Apple Supplier List 2020	Customer - Apple	Judicial Notice	401 403	SG not listed; Defs' MIL 2	
829	Exchanged on 9/9/2021		Year 2019	Apple Supplier List 2019	Customer - Apple	Judicial Notice	402 403	SG not listed; Defs' MIL 2	

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TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
830	Exchanged on 9/9/2021		Year 2018	Apple Supplier List 2018	Customer - Apple	Judicial Notice	403 403 26	SG not listed; Defs' MIL 2	
831	Exchanged on 9/9/2021		Year 2017	Apple Supplier List 2017	Customer - Apple	Judicial Notice	404 403 26	SG not listed; Defs' MIL 2	
832	Exchanged on 9/9/2021		Year 2016	Apple Supplier List 2016	Customer - Apple	Judicial Notice	405 403 26	SG not listed; Defs' MIL 2	
833	Exchanged on 9/9/2021		Year 2015	Apple Supplier List 2015	Customer - Apple	Judicial Notice	406 403 26	SG not listed; Defs' MIL 2	
834	Exchanged on 9/9/2021		Year 2014	Apple Supplier List 2014	Customer - Apple	Judicial Notice	407 403 26	SG not listed; Defs' MIL 2	
835	Exchanged on 9/9/2021		Year 2019	Apple Supplier Code of Conduct 2019	Customer - Apple	Judicial Notice	408 403 26	Supplier selection process; Defs' MIL 2	
836	Exchanged on 9/9/2021		Year 2018	Apple Supplier Code of Conduct 2018	Customer - Apple	Judicial Notice	409 403 26	Supplier selection process; Defs' MIL 2	
837	Exchanged on 9/9/2021		Year 2017	Apple Supplier Code of Conduct 2017	Customer - Apple	Judicial Notice	410 403 26	Supplier selection process; Defs' MIL 2	
838	Exchanged on 9/9/2021		Year 2020	Apple Supplier Code of Conduct 2020	Customer - Apple	Judicial Notice	411 403 26	Supplier selection process; Defs' MIL 2	
839				INTENTIONALLY OMITTED					
840	Exchanged on 9/9/2021		Year 2016	Apple Supplier Code of Conduct 2016	Customer - Apple	Judicial Notice	413 403 26	Supplier selection process; Defs' MIL 2	
841	Exchanged on 9/9/2021		Year 2015	Apple Supplier Code of Conduct 2015	Customer - Apple	Judicial Notice	414 403 26	Supplier selection process; Defs' MIL 2	
842	Exchanged on 9/9/2021		Year 2021	Apple Supplier Code of Conduct 2021	Customer - Apple	Judicial Notice	415 403 26	Supplier selection process; Defs' MIL 2	
843				INTENTIONALLY OMITTED					
844	DEFS_0182789	DEFS_0182790	2/5/2015	Records re: Santa Clara, CA Company	Customer - Intel	Cy NG Mark Liew	401	Pre-existing DG-Intel relationship	
845	DEFS_0182800	DEFS_0182801	7/26/2013	Records re: Santa Clara, CA Company	Customer - Intel	Cy NG Mark Liew	401	Pre-existing DG-Intel relationship	
846	NG00106	NG00106	None	CY NG Xingke Business Card	Ng - Employment	Cy NG			
847	NG0002078 /	NG0002087 /	None	SinCo Slide Deck	SinCo - Company Materials	Cy NG			
848	ML17253	ML17253	None	ML Tjoo Business Card	Tjoo representations to	ML Tjoo			
849	DEFS_0148746	DEFS_0148750	10/12/2017	Xingke Vendor Set up with Motorola	Xingke-Motorola Business relationship	SinCo DG		Business record; non-hearsay purpose of Motorola's state of mind and/or knowledge it was dealing with Xingke	
850	DEFS_0111681	DEFS_0111685	10/12/2017	Xingke Vendor Form with Motorola	Xingke-Motorola Business relationship	SinCo DG	802	Business record; non-hearsay purpose of Motorola's state of mind and/or knowledge it was dealing with Xingke	
851	DEFS_3862412			Xingke Revenue Report -Tech Full Computer Changshu Co. Ltd. - Apple Band	DG-Xingke Revenue	Mark Liew	401 26 MIL	Defs' Opp to MIL 2; damages	
852	DEFS_3862413			Xingke Revenue Report -Apple Inc. - Apple Band	DG-Xingke Revenue	Mark Liew	402 26 MIL	Defs' Opp to MIL 2; damages	
853	DEFS_3862414			Xingke Revenue Report -Compal Smart Device Chongquin Co. Ltd. - Apple Band	DG-Xingke Revenue	Mark Liew	403 26 MIL	Defs' Opp to MIL 2; damages	
854	DEFS_3862415			Xingke Revenue Report - Hongzhaoda Integrated Innovative Service Kunshan Co. Ltd. - Apple Band	DG-Xingke Revenue	Mark Liew	404 26 MIL	Defs' Opp to MIL 2; damages	

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855	DEFS_3862416			Xingke Revenue Report - Tech Com Chongqing Computer Co. Ltd. - Apple Band	DG-Xingke Revenue	Mark Liew	405 26 MIL	Def's Opp to MIL 2; damages	
856	DEFS_3862417			Xingke Revenue Report - Hon Hai Precision Industry Co. Ltd. - Apple Band	DG-Xingke Revenue	Mark Liew	406 26 MIL	Def's Opp to MIL 2; damages	
857	DEFS_3862403			Xingke Revenue Report - Swiftronic Pte Ltd. - Apple Phone Case	DG-Xingke Revenue	Mark Liew	407 26 MIL	Def's Opp to MIL 2; damages	
858	DEFS_3862404			Xingke Revenue Report - Bristrip Metal Industrial Ltd. (2017) - Apple Phone Case	DG-Xingke Revenue	Mark Liew	408 26 MIL	Def's Opp to MIL 2; damages	
859	DEFS_3862411			Xingke Revenue Report - Cosmoindustries Dongguan Co. Ltd. USD currency - Apple Phone Case	DG-Xingke Revenue	Mark Liew	409 26 MIL	Def's Opp to MIL 2; damages	
860	DEFS_386418			Xingke Revenue Report - Bristrip (2015) - Apple Phone Case	DG-Xingke Revenue	Mark Liew	410 26 MIL	Def's Opp to MIL 2; damages	
861	DEFS_3862419			Xingke Revenue Report - Cosmoindustries Dongguan Co. Ltd. RMB currency - Apple Phone Case	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
862	DEFS_3862420			Xingke Revenue Report - Swiftronic Pte Ltd. - Apple Phone Case	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
863	DEFS_3862405			Sinco Technology Sales Revenue Report (For Apple Phone Case) - 2010	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
864	DEFS_3862406			Sinco Technology Sales Revenue Report (For Apple Phone Case) - 2011	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
865	DEFS_3862407			Sinco Technology Sales Revenue Report (For Apple Phone Case) - 2012	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
866	DEFS_3862408			Sinco Technology Sales Revenue Report (For Apple Phone Case) - 2013	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
867	DEFS_3862409			Sinco Technology Sales Revenue Report (For Apple Phone Case) - 2013 to 2015	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
868	DEFS_3862410			Sinco Technology Sales Revenue Report (For Apple Phone Case) - 2013 to 2017	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
869	DEFS_3862421			Xingke Revenue Report - Sinco -2013-2015 - Bose	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
870	DEFS_3862422			Xingke Revenue Report - Sinco -2015-2017 - Bose	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
871	DEFS_3862423			Xingke Revenue Report - IntriCon Pte. Ltd. - Bose	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
872	DEFS_3862424			Xingke Revenue Report - Flextronic International Europe B.V. - Bose	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
873	DEFS_3862425			Xingke Revenue Report - Sinco Technologies Pte. Ltd. - Bose	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
874	DEFS_3862428			Xingke Revenue Report - Tech -Front (Chongqing) Computer Co. Ltd. - Google	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
875	DEFS_3862429			Xingke Revenue Report TCL - Google	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
876	DEFS_3862430			Xingke Revenue Report - Google	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	

TRIAL EXHIBIT NO.	BEGINBATES	END BATES	DATE	DESCRIPTION	REASON OFFERED	SPONSORING WITNESS	OBJECTION(S)	RESPONSE(S) TO OBJECTION(S)	SPACE FOR COURT
877	DEFS_3862426			Summary of Sales of Xingke from 2010 to 2020	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
878	DEFS_3862427			Xingke Revenue Report - Verizon	DG-Xingke Revenue	Mark Liew	401 26 MIL	Def's Opp to MIL 2; damages	
879	Def's MIL No. 2, Ex. F / DEFS_3862383	DEFS_3862399	8/31/2021	Xingke Appellate Petition	Provisional - If Defs' MIL No. 2 denied	Judicial Notice	802 401 403	Def's Opp to MIL 2; recent document	
880	Exchanged on 9/9/2021		12/7/2006	Archived SinCo DG website from 2006	DG customer sales	Judicial Notice	26 MIL	Def's Opp. to MIL 2; JM - Defs' Obj. (e)	
881	Exchanged on 9/9/2021		6/25/2016	Archived SinCo DG website from 2016	DG customer sales	Judicial Notice	27 MIL	Def's Opp. to MIL 2; JM - Defs' Obj. (e)	
882	DEFS_0006068	DEFS_0006069	8/3/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
883	DEFS_0007118	DEFS_0007119	6/30/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
884	DEFS_0007121	DEFS_0007122	8/24/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
885	DEFS_0010522	DEFS_0010523	6/30/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
886	DEFS_0010526	DEFS_0010527	6/16/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
887	DEFS_0010539	DEFS_0010540	8/3/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
888	DEFS_0010550	DEFS_0010552	8/12/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
889	DEFS_0010553	DEFS_0010554	8/24/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
890	DEFS_0184026	DEFS_0184027	6/30/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
891	DEFS_0184028	DEFS_0184029	8/3/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
892	DEFS_0184030	DEFS_0184031	8/24/2016	Avegant Purchase Order	DG customer sales	Mark Liew	401 403	DG use of SinCo mark to US customer	
	DEFS_0103036	DEFS_0103069	9/29/2017	Email from Dobeus (Motorola) to CH Lim (Xingke) re -Xingke	Customer - Motorola	Cy NG Mark Liew Gouki Gao	401 26 MIL	Xingke-Motorola direct dealings; produced before close of fact discovery (bates range); in any event, see Defs' Opp. to MIL 2.	
893									
894	Mark Liew 000224		10/28/2016	SinCo Group Holdings Prd Record	Lim relationship with Xingke	Bryan Lim	106 401 403	Lim's control and knowledge re DG activities	
895	DEFS_3798391		None	Cy Ng DG Business Card and Badge	Employment	Cy Ng	MIL 2, FRCP 26	Def's Opp. to MIL 2	
896	DEFS_3798512		None	Mark Liew DG Business Card and Badge	Employment	Mark Liew	MIL 2, FRCP 26	Def's Opp. to MIL 2	



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 XINGKE ELECTRONICS (DONGGUAN) CO.,  
 LTD. Formerly known as SINCO ELECTRONICS  
 (DONGGUAN) CO. LTD., MUI LIANG TJOA ak:  
 ML TJOA, NG CHER YONG aka CY NG, and  
 LIEW YEW SOON aka MARK LIEW

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

SINCO TECHNOLOGIES PTE LTD,  
 Plaintiff,

v.

SINCO ELECTRONICS (DONGGUAN) CO.,  
 LTD.; XINGLE ELECTRONICS  
 (DONGGUAN) CO., LTD.; XINGKE  
 ELECTRONICS TECHNOLOGY CO., LTD.;  
 SINCOO ELECTRONICS TECHNOLOGY  
 CO., LTD.; MUI LIANG TJOA (an  
 individual); NG CHER YONG aka CY NG (an  
 individual); and LIEW YEW SOON aka  
 MARK LIEW (an individual),

Defendants.

Case No. 3:17CV5517

**JOINT STATEMENT ON  
 OBJECTIONS TO EXHIBITS**

**PRETRIAL HEARING**

Date: October 2, 2021  
 Time: 3:00 p.m.  
 Place: Courtroom 5 17<sup>th</sup> Floor  
 Judge: Hon. Edward M. Chen

**TRIAL DATE**  
 November 1, 2021

Pursuant to the Court's Standing Order re: Pretrial Instructions in a Civil Case, the parties hereby submit this joint statement in which each party has identified fifteen of the opposing party's exhibits for which the identifying party is seeking a ruling on objections in advance of trial. Each party has identified exhibits that it believes are critical to the case or exhibits that it believes are representative of other exhibits such that the identified exhibit will provide a bellwether as to how the Court will rule on other exhibits.

#### **I. DEFENDANTS' PROPOSED EXHIBITS TO WHICH PLAINTIFF OBJECTS**

Plaintiff, SINCO TECHNOLOGIES, PTE, LTD. ("SINCO"), amended its exhibits list in response to the Defendants' exhibits, specifically as to Exhibits 44, 79-80, 265, and 398-399. SINCO reserves the right to use any exhibit listed by Defendants' in their Exhibits 500-943, and to revise this list in light of further rulings by the Court or any other changed circumstances, including but not limited to being notified that a sponsoring witness is unavailable. SINCO generally objects to the designation of "Exchanged on 9/9/2021" as these documents were not provided prior to the close of discovery and SINCO had no opportunity to conduct discovery specific to those issues. SINCO further objects to the designations of information identified in Defendants' Exhibit list that are modified to change the context of the evidence in violation of FRE 106, which is denoted throughout as email attachments are not included or in the alternative a single attachment is referenced divorce from the email to which it was attached or related attachments which the recipient would have reviewed together.

#### **SINCO OBJECTION KEY**

<b>OBJECTION</b>	<b>SHORT DESCRIPTION</b>	<b>DETAILED DESCRIPTION</b>
106	<i>Incomplete</i>	<i>The exhibit is incomplete, and if used in fairness should be provided in a complete form.</i>
401	<i>Relevance</i>	<i>The exhibit is inadmissible to the extent it is irrelevant to the issues to be tried. See Fed. R. Civ. P. 32(d)(3)(A) and FRE 401-402.</i>
403	<i>Unfair Prejudice / waste of time</i>	<i>The exhibit is inadmissible to the extent that any probative value it may have is substantially outweighed by the danger of unfair prejudice, confusion of the issues, undue delay, or needless presentation of cumulative evidence. See FRE 403.</i>

OBJECTION	SHORT DESCRIPTION	DETAILED DESCRIPTION
609	<i>Presumption Prior Conviction over 10 years inadmissible/failure to provide notice</i>	<i>In attacking a witness's character for truthfulness by evidence of a criminal conviction, evidence of a crime that is admissible only if (1) its probative value, supported by specific facts and circumstances, substantially outweighs its prejudicial effect; and (2) the proponent gives an adverse party reasonable written notice of its intent to use it so that the party has a fair opportunity to contest its use. FRE 609(b).</i>
802	<i>Hearsay</i>	<i>The exhibit is inadmissible to the extent it is offered to prove the truth of the matter asserted without a proper sponsoring witness. See FRE 801(c), 802, 805.</i>
MIL	<i>Subject to Motion in limine</i>	<i>The document, or a portion thereof, is subject to at least one of the parties' pending motions in limine and is inadmissible for the reasons described in the motion(s) in limine. To the extent the Court grants the at-issue motion(s) in limine, the document or at-issue portion thereof is inadmissible. To the extent only a portion of an exhibit is impacted by the Court's motion in limine order, the parties reserve the right to move into evidence a redacted version, or portion thereof, of that exhibit.</i>
26	<i>Rule 26 Disclosure Requirement and Court's Scheduling Order of June 13, 2019 [ECF 225]</i>	<i>FRCP 26(a)(1)(A)(i) requires a party to disclose "the name and, if known, the address and telephone number of each individual likely to have discoverable information ... that the disclosing party may use to support its claims or defenses." The Rule further requires that each party must supplement or correct this initial disclosure "in a timely manner if the party learns that in some material respect the disclosure ... is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing...." Id. at 26(e)(1)(A). SINCO2,196,780 and DEFS_0257,890.</i>

## II. PLAINTIFF'S EXHIBITS TO WHICH DEFENDANTS' OBJECT

a. Exhibit 17. SinCo SG Purchase Orders "Spliced" With its Terms and Conditions

**Objections** (Foundation/Authenticity/FRE 403). In Exhibit 17, Plaintiff splices together two distinct documents to create the false impression that they were a single document. Specifically, Plaintiff appends "terms and conditions" (SINCO000109-110) to various purchase orders that were sent by SinCo SG to XingKe *without Terms & Conditions attached* (SINCO032222-32230). This explains why the Bates range for the terms and conditions does not come immediately after the purchase orders. *Compare, e.g.*, (Purchase Order [SINCO30222] *and* (Terms and Conditions [SINCO000109]. The "terms and conditions" should be excluded because Plaintiff did not disclose an email in native form in which such a document is attached (to which Defendants did not object). At minimum, Plaintiff must present these as separate exhibits. **Bellwether Exhibits:** a ruling on this exhibit may also impact Exhibits 18-20.

b. Exhibit 53. March 9, 2018 E-mail from Defendant ML Tjoa to Google

**Objections** (Fed. R. Evid. 403 and 407). The e-mail between Defendant Tjoa and Google should be excluded because its probative value is substantially outweighed by its unfair prejudice, and because it qualifies as a subsequent remedial measure. In response to an inquiry *specifically about the litigation between Plaintiff and Defendants*, Tjoa states that he has already "instructed the XingKe team to stop using Sinco to avoid confusion with other Sinco entities." Tjoa's corrective action was taken after the initiation of the lawsuit by Plaintiff and was thus in direct response to allegations of trademark infringement to address allegedly culpable conduct. As such, it should be excluded as a subsequent remedial measure under Rule 407.

c. Exhibit 89. Affidavit and Prior Sworn Declaration by Guanglei Zhang

**Objections** (Hearsay, Foundation, Fed. R. Evid. 403). Mr. Zhang is an attorney that was retained by *Plaintiff* to represent its interest in China in a trademark proceeding adverse to XingKe. Plaintiff cannot introduce a declaration previously submitted in support of its Motion for Summary Judgment by its own lawyer who will not be testifying at trial. (Defendants have separately objected to Mr. Zhang’s testimony at trial as a non-disclosed witness, who lacks personal knowledge, and whose testimony as an advocate for Plaintiff would be irrelevant and unfairly prejudicial.). This declaration constitutes hearsay for which no hearsay exception applies. *See Copeland v. Bank of America Serving*, No. 13-cv-1578, 2015 WL 13390030, at \*3 (C.D. Cal. July 29, 2015). Moreover, the declaration attaches a “Certificate of Dissolution” and purported “minutes of the board meeting” even though the witness cannot lay the proper foundation for these documents. **Bellwether Exhibits:** A ruling for Exhibit 89 may serve as a bellwether for Exhibits 84 and 90.

d. Exhibit 75. Plaintiff’s Own Statements to Bose Regarding SinCo DG

**Objections** (Hearsay and Fed. R. Evid. 401 and 403). Plaintiff seeks to introduce its own out-of-court and self-serving statements to customers, such as Bose. For example, in Exhibit 75, Jonathan Chee, Plaintiff’s COO, emails Bose on January 18, 2017 that his due diligence of SinCo DG uncovered “very real risks of [Corporate Social Responsibility] violations” at the factory. He goes on to describe allegedly how the factory lacks an anodizing license, has been operating illegally for years, and that SinCo DG’s former owners “sold their shares illegally to the Jin Long Group,” which he then describes as a “very shady and complicated” business group. Plaintiff may assert that this exhibit is also listed on Defendants’ Exhibit List, but that fact is irrelevant. It is hearsay when offered by Plaintiff because Chee is the declarant (*Cnty of Stanislaus v. Travlers Indemnity Co.*, 142 F. Supp. 3d 1065, 1076 (E.D. Cal. 2015)), and presumably and impermissibly would be used by Plaintiff in an effort to bolster Chee’s testimony.

e. Exhibit 133. XingKe Website

**Objections** (Fed. R. Evid. 106). The rule of completeness “was designed to prevent a party from offering a ‘misleadingly-tailored snippet.’” *United States v. Castro-Cabrera*, 534 F. Supp. 2d 1156, 1160 (C.D. Cal. 2008). Plaintiff seeks to introduce Xingke’s website from January 2019 for the purpose of “trademark.” Defendants do not object to the introduction of such evidence; however, under the rule of completeness, Defendants seek to admit into evidence printouts of SinCo DG’s website (XingKe’s old name) from 2006 and 2016 in which the “SinCo” logo is prominently displayed. *See* Exhibits 880-881. This serves as circumstantial evidence that SinCo DG was in fact granted an expansive oral license by SinCo SG to use the “SinCo” mark. It evidences that Plaintiff was on notice that SinCo DG’s website displayed the SinCo mark but failed to object; and, indeed, that Plaintiff required what was formerly SinCo SG (now XingKe) to hold itself out as a member of “SinCo” to the outside world.

f. Exhibit 119. Testimony Before Congressional Committees

**Objections** (Hearsay, Fed. R. Evid. 401 and 403, Fed. R. Civ. P. 37(c)(1)). Plaintiff seeks to introduce prior sworn testimony of several non-witnesses before Congress regarding the impact of trademark infringement. But prior testimony before Congressional Committees is “manifestly hearsay.” *Pearce v. E.F. Hutton Group, Inc.*, 653 F. Supp. 810, 815 (D.D.C. 1987). Moreover, the prevalence and impact of “fraudulent trademarks” and “counterfeit” products on the United States is not relevant to this case and will only inflame the passions of the jury against Defendants, thereby leading to a finding of liability or damages for improper reasons. *See* Fed. R. Evid. 401 and 403. Lastly, the admission of such evidence would constitute undisclosed expert testimony, in violation of Fed. R. Civ. P. 26. *See Lannes v. Flowserve U.S., Inc.*, 628 F. App’x 957, 960 (9th Cir. 2015) (precluding expert declaration submitted at summary judgment because parties were required to disclose the identify of any expert witness). **Bellwether Exhibits:** A ruling for Exhibit 119 may serve as a bellwether for Exhibits 120-121.

g. Exhibit 171. Mark Liew's Emails with Google

**Objection** (Fed. R. Evid. 106 - Rule of Completeness). Exhibit 171 reveals Defendant Liew's communications with a Google employee named Matthew Wilson. from July 2017, in which Liew used his liewyewsoon@sincocn.cn email address. Plaintiff seeks to introduce this exhibit as evidence of Liew purportedly passing himself off as Plaintiff's employee. Defendants do not object to the inclusion of this exhibit into evidence; however, Defendants request that under Fed. R. Evid. 106, it be permitted to introduce Liew's emails with this same employee merely a month later in August 2017, during which time Liew used his markliew@xingkecn.com email address regarding the same project. *See* SINCO791330-SINCO791333. Defendants should be able to introduce Liew's communications with Matthew the next month regarding Google because excluding it portrays a misleading and distorted narrative that Matthew always believed that Liew worked for SinCo and that this fact was material in his decision to continue to retain Defendants' services. *See United States v. Castro-Cabrera*, 534 F. Supp. 2d 1156, 1160-61 (C.D. Cal. 2008). On the contrary, the subsequent email exchange with Matthew shows that the "SinCo" mark was not a factor in Google's decision to work with Defendants. Furthermore, Liew's statements are offered for their effect on the listener (the customer) and for Matthew's state of mind and are thus not hearsay. Fed. R. Evid. 803(3).

h. Exhibit 193. Email regarding Jinlong Machinery & Electronics' Bankruptcy

**Objections** (Fed. R. Evid. 401, 403, and 404; *See* Defendants' Motion In Limine No. 6). This is as strong exemplar of Defendants' Motion in Limine No. 6. Evidence concerning Jinlong Machinery Electronics' ("Jinlong") bankruptcy in 2018 due to its inability to repay a bank loan is irrelevant to the issue of trademark infringement and, alternatively, its probative value is substantially outweighed by the danger of unfair prejudice to Defendants. The evidence appears to be offered as an attempt to attack the overall character of XingKe's parent company, Jinlong, and to suggest, without evidence, a specter of corporate malfeasance, which, in any event, would be irrelevant and inadmissible.



i. Exhibit 351. Evidence related to Indemnification by Xingke.

**Objections** (Fed. R. Evid. 401, 403, and 411). Plaintiff seeks to introduce evidence of the existence of an indemnification agreement between Defendants Tjoa and XingKe. Plaintiff's purpose for offering these exhibits is listed as "Indemnification / Damages." The introduction of such evidence for these reasons is improper. *See Larez v. Holcomb*, 16 F.3d 1513, 1519 (9th Cir. 1994) (reciting that "[i]t has long been the rule in our courts that evidence of insurance or other indemnification is not admissible on the issue of damages"); *Curtis Mfg. Co., Inc. v. Plasti-Clip Corp.*, 933 F. Supp. 94, 100-01 (D.N.H. 1995) (excluding evidence of individual defendant's indemnification agreement with corporate defendant under Rule 411).

**Bellwether Exhibit:** A ruling here may serve as a bellwether for Exhibit 239.

j. Exhibit 364. SinCo's Second Amended Complaint in Instant Action

**Objections** (Hearsay and Fed. R. Evid. 403). The Court should prohibit Plaintiff from introducing its own self-serving pleading into evidence because these out-of-court statements fall squarely within the definition of hearsay when offered by Plaintiff. *See World Fuel Servs.*, 3:16-cv-02303-MO, 2020 WL 69999224, at \*3 (D. Oregon Jan. 13, 2020); *Edelhertz v. City of Middletown*, 943 F. Supp. 2d 388, 391 n.2 (S.D.N.Y. 2012). Furthermore, the Complaint makes various unsupported prejudicial allegations against Defendants that are not relevant to trademark infringement. Defendants, however, reserve the right to impeach Plaintiff's witnesses with the Complaint under Fed. R. Evid. 613. **Bellwether Exhibit:** The Court's ruling may also apply to Exhibit 363.



k. Exhibit 373. Jonathan Chee's emails with Xu Shu Gong

**Objection** (Hearsay). Plaintiff cannot introduce into evidence the communications of its agents, Jonathan Chee and Bryan Lim, with SinCo DG's formers owners, who are not parties to the instant action. To be sure, this exhibit is also listed on Defendants' Exhibit List. But that is no matter: it is hearsay when offered by Plaintiff because Chee is the declarant, *see Cnty of Stanislaus v. Travelers Indemnity Co.*, 142 F. Supp. 3d 1065, 1076 (E.D. Cal. 2015), and thus only Defendants should be permitted to introduce this exhibit into evidence at the appropriate time. Xu is neither a party to this action nor is he Defendants' authorized agent. In the event Plaintiff attempts to argue that all work-related e-mails constitute a business record, this argument fails. *See Venture Corp. Ltd. v. Barrett*, No. 5:13-cv-03384-PSG, 2015 WL 2088999, at \*2 (N.D. Cal. May 5, 2015); *In re Oil Spill*, No. MDL 2179, 2012 WL 85447, at \*2 (E.D. La. Jan. 11, 2012). Defendants reserve the right to admit these emails into evidence because Chee is a party opponent.

l. Exhibit 389. Death Threats.

**Objections** (Hearsay; double-hearsay; lack of foundation; and Fed. R. Evid. 401 and 403). This exhibit is a Singapore Police Report filed by Jonathan Chee in which Chee reports receiving death threats from a Philippines phone number. It should be excluded for a number of reasons. First, Chee's out-of-court statements filtered through the police report are hearsay. *See Colvin v. United States*, 479 F.2d 988, 1003 (9th Cir. 1973) ("[S]tatements attributed to other persons [in police reports] are clearly hearsay[] and inadmissible[.]"). Second, Chee cannot lay the foundation for a police report because he is not a proper custodian under Fed. R. Evid. 803(6). Finally, it is irrelevant and unduly prejudicial because there is no evidence that anyone connected with Defendants made these death threats, but the clear insinuation of offering the exhibit is to suggest that Defendants threatened to kill Chee, and that somehow the "police" have validated that insinuation by the fact that Chee

1 reported it. It would be hard to image more unfairly prejudicial evidence.

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3 m. Exhibit 398. Plaintiff's Expert Report and Exhibits.

4 **Objections (Hearsay and FRE 403).** Plaintiff cannot admit into evidence the report of its  
5 own expert witness Alan Cox. *See Hunt v. City of Portland*, 599 F. App'x 620, 621 (9th Cir.  
6 2013) (concluding that expert report was inadmissible hearsay). This prohibition should also  
7 equally apply to the underlying evidence Cox relies upon to form the basis of his opinion,  
8 unless Plaintiff can introduce such evidence through alternative means; Cox, of course,  
9 cannot lay the foundation for Plaintiff's business records under Rule 803(6). Nor may an  
10 expert witness proffer case-specific hearsay (as opposed to out-of-court material generically  
11 relevant to such expert's purported expertise).

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13 n. Exhibit 399. Reasons Why Amazon Disqualified SinCo DG

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15 **Objections (Hearsay and FRE 403).** Plaintiff seeks to introduce the results of an Amazon  
16 Audit of the SinCo DG factory, which ultimately led to Amazon disqualifying SinCo DG  
17 and SinCo SG as Amazon suppliers in 2017. There are certain highly inflammatory  
18 statements in the Amazon audit (which are not true and which are misleadingly stated). They  
19 are inadmissible for two reasons. First, Amazon's audit findings constitute hearsay if offered  
20 by SinCo SG to prove the truth of the alleged audit findings. Second, even if a hearsay  
21 exception applies, this evidence would constitute unfair prejudice to Defendants.  
22 Specifically, according to the Amazon report, SinCo DG's factory suffered from a myriad  
23 of issues, including: (1) the factory's catering service license was out of date; (2) the factory  
24 failed to provide registration requirements of when certain structures were built; (3) the  
25 factory failed to enroll all of its employees into various social insurance programs; (4) the  
26 factory required workers to regularly work overtime; and (5) failed to maintain various safety  
27 mechanisms. Not only does this paint SinCo DG in a unsavory light, but it has nothing to  
28

do with whether SinCo DG allegedly committed trademark infringement. Defendants, by contrast, intend to submit different exhibits for the narrow purpose of showing that Amazon disqualified both companies after the factory failed an audit conducted by Amazon, as this shows an alternative explanation unrelated to trademark infringement why SinCo SG's sales to Amazon decreased during the relevant time period. However, the specific reasons for the disqualification fail a balancing test under Rule 403.

Dated:

Respectfully submitted,

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